

Reviewer's Guide to SMI

School Nutrition Reviews And Technical Assistance



**United States
Department of Agriculture
Food and Nutrition Service**



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What's in this Manual?

This Manual Includes

1. Policies, procedures, and guidance for State agency (SA) personnel to conduct SMI reviews.
2. Recommendations for scheduling, planning, and conducting reviews.
3. Print-ready review forms and instructions in a Supplement to the Reviewer's Guide to SMI. The forms are also available in an Excel version.

Two Complementary Manuals

There are two complementary SMI guidance manuals that reviewers should examine. They are:

- ***Nutrient Analysis Protocols: How to Analyze Menus for USDA's School Meals Programs*** provides protocols and procedures for SA and School Food Authorities (SFAs) to use when performing nutrient analysis using USDA-approved software; and
- ***The Road to SMI Success: A Guide for School Foodservice Directors*** provides an overview and comparison of the various menu planning approaches, expanded guidance for Nutrient Standard Menu Planning (NSMP) and Assisted Nutrient Standard Menu Planning (ANSMP), recommended daily practices and tips for meeting the nutrition standards for all menu planning approaches, SFA guidance for preparing for an SMI Review, and SMI resources.

Additional resources for SMI reviewers include:

- Statutory Authority: Section 9 of the Richard B. Russell National School Lunch Act (NSLA) and Section 4 of the Child Nutrition Act of 1966 (CAN).
- Federal Regulations: 7 CFR 210.10, 210.19; 7 CFR 220.8 and 220.13
- USDA's ***A Menu Planner for Healthy School Meals***
- USDA's ***Offer vs. Serve (OVS) in the School Nutrition Programs***
- USDA's ***Food Buying Guide for Child Nutrition Programs***
- USDA's ***Guidance for School Food Authorities: Developing a School Food Safety Program Based on the Process Approach to HACCP Principles***

Introduction

Background of the School Meals Initiative

The Healthy Meals for Healthy Americans Act of 1994¹ amended the NSLA and CAN to require that meals served under the National School Lunch Program (NSLP) and School Breakfast Program (SBP) meet the *Dietary Guidelines for Americans*. In 1995, the Food and Nutrition Service (FNS) of the United States Department of Agriculture (USDA) issued implementing regulations for the various nutrition-related statutory requirements. These regulations, the School Meals Initiative (SMI) for Healthy Children, define how the *Dietary Guidelines for Americans* and other nutrition standards apply to school meals. This Initiative includes actions to support State agencies (SAs) and school food authorities (SFAs) in improving school meals and encouraging children to improve their overall diets.

The term “SMI” is often used as an abbreviated term for all of the regulations and policies that address the school meals nutrition standards and the menu planning approaches available to SFAs.

The five menu planning approaches are:

Two food-based approaches

- Traditional Food-Based Menu Planning
- Enhanced Food-Based Menu Planning

Two nutrient-based approaches

- Nutrient Standard Menu Planning (NSMP)
- Assisted Nutrient Standard Menu Planning (ANSMP)

Alternate (Any reasonable approach menu planning) approaches

State agency staff are encouraged to review the <i>Road to SMI Success: A Guide for School Foodservice Directors</i> , Chapter 2, which provides an overview of the menu planning approaches and approved modifications.
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¹ P.L. No. 103-448, sec. 106 (1994).

SAs are required to evaluate SFA compliance with the nutrition standards for reimbursable school meals. These reviews are designed to monitor and assist schools in providing healthful and nutritious meals to the nation's school children.

USDA School Meals Initiative for Healthy Children—Nutrition Standards

Nutrition Standards or Goals: A collective term for the minimum nutrition goals that school meals for students two years of age or older must meet when averaged over a school week. They are based on the Recommended Dietary Allowances for specific nutrients and children's calorie (energy) requirements, as well as the applicable recommendations from the 1995 *Dietary Guidelines for Americans* (DGAs). [The 1995 DGAs are addressed in current regulations. USDA will propose changes as needed to incorporate appropriate nutrition recommendations from newer editions of the DGAs as they are published.]

- **Recommended Dietary Allowances (RDA)**
 - *1/4 RDA for appropriate age/grade group for breakfast for protein, calcium, iron, vitamin A and vitamin C*
 - *1/3 RDA for appropriate age/grade group for lunch for protein, calcium, iron, vitamin A and vitamin C*
- **Recommended Energy Allowances (calories)**
 - *Appropriate for age/grade group*
- **1995 Dietary Guidelines for Americans**
 - Eat a variety of foods.
 - Limit total fat to $\leq 30\%$ of calories.
 - Limit saturated fat to $<10\%$ of calories.
 - Choose a diet low in cholesterol.
 - Choose a diet with plenty of vegetables, fruits, and grain products.
 - Choose a diet moderate in salt and sodium.

Nutrient Standards: The required level of calories, calories from fat, and key nutrients for a specific grade or age group for breakfast and lunch. Nutrient levels were established according to the 1989 Recommended Dietary Allowances (RDA) and calories from fat and saturated fat are based on the 1995 *Dietary Guidelines for Americans*.

The nutrient standards for the food-based menu planning approaches and the nutrient-based menu planning approaches are included in Appendix A. Also included are allowable modifications for the food-based and nutrient-based approaches.

SMI Authority

The National School Lunch Act (42 U.S.C. 1758) provides the statutory authority for the nutrition requirements for school meals, while the Child Nutrition Act of 1966 (42 U.S.C. 1773) establishes compliance with those nutrition requirements for the School Breakfast Program. The Federal regulations concerning monitoring compliance with nutrition standards can be found in 7 CFR §210.19 and 7 CFR §220.13.

A summary of the SMI regulatory requirements is located in Appendix B.
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State Agency and School Food Authority SMI Responsibilities

SFAs must serve meals that are consistent with the goals of the *Dietary Guidelines* and provide the appropriate calorie and nutrient levels based on RDAs to the applicable grade or age group(s).

In addition, both FNS and the SA have a responsibility to ensure that SFAs are meeting the nutrition standards. This includes providing the following:

- SFA guidance on policies and procedures,
- SFA training, support, and technical assistance,
- Periodic monitoring of SFAs for compliance with the nutrition standards,
- Ensuring that SFAs have corrective action plans as needed based on the SMI review, and
- Ensuring that all corrective actions are accomplished in a timely manner.

Chapter I: An Overview of the SMI Review Process

Monitoring Compliance with the Nutrition Standards

State agencies (SAs) are required to monitor SFAs for compliance with the nutrition standards at least once during each five-year SMI review cycle. This compliance evaluation shall cover the menus for any week of the current school year in which the evaluation is conducted. The week selected must reflect the current menu planning approach(es) used by the SFA.

At a minimum, the State agency must review <i>at least one school for each type of menu planning approach</i> used in the SFA.
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What an Effective SMI Review Should Include

- Evaluating the SFA's implementation of the menu planning approach(es);
- Determining how well the SFA is meeting the nutrition standards both **quantitatively** and **qualitatively**;
- Obtaining and verifying information for the SA-conducted nutrient analysis *or* obtaining and verifying the SFA-conducted nutrient analysis;
- Conducting an on-site visit to observe products and procedures that verify the nutrient analysis;
- Tracking the SFA's progress in meeting the nutrition standards for planned menus, including:
 - Areas that were identified as needing improvement during previous SMI reviews, and
 - Identifying and providing positive feedback on practices the SFA has implemented in working towards the nutrition standards;
- Assisting the SFA in developing a corrective action plan if the SFA is not in compliance with nutrition standards;
- Providing on-going technical assistance and resources to help the SFA to serve more nutritious and safe meals; and
- Providing follow-up as needed to monitor progress with the corrective action plan or other goals.

SMI Versus CRE Reviews

In addition to SMI reviews, State agencies must conduct administrative reviews, which are more commonly known as Coordinated Review Effort (CRE) reviews. The regulatory requirements for CRE are in §210.18, while the regulations for SMI compliance reviews are found in §210.19.

There are differences between the goals and methodologies of the SMI and those of CRE reviews. CRE reviews have prescribed procedures and forms detailed in the regulations and in policy directives.

CRE reviews have three primary goals:

1. To ensure that free and reduced price meal benefits are provided in accordance with the regulations.
2. To ensure that proper meal counts are taken at the point of service.
3. To ensure that complete, reimbursable meals are being offered.

SMI review goals are:

1. To ensure program meals meet nutrition standards and are reimbursable.
2. To ensure that SFAs receive the necessary technical assistance and resources to meet those standards.

There is some overlap between CRE and SMI reviews

During a CRE review, the SA determines if the SFA is offering and serving reimbursable meals.

- **In the food-based menu planning approaches (FBMP)**, a reimbursable meal is evaluated by ensuring that on the day of review the SFA plans and serves the required number of creditable food items from the established components.
- **In the nutrient-based (NSMP/ANSMP) menu planning approaches**, the basis of a reimbursable meal is the service of the planned menu—which was analyzed in accordance with the regulatory and guidance criteria. Also, the planned menu must:
 - Meet the appropriate nutrient standards for the planned age/grade group, and
 - Offer, *at a minimum*, for lunch—an entrée, a side dish, and fluid milk, and for breakfast—two side dishes and fluid milk.

During an SMI review, the SA not only determines if the SFA offers reimbursable meals but also evaluates if those meals comply with the nutrition standards.

Review Cycle and Review Timeframe

At a minimum, SAs shall conduct evaluations of SFA compliance with the nutrition standards at least once during each five-year review cycle provided that each SFA is evaluated at least once every 6 years. However, the first SMI review cycle (July 1, 1996 through June 30, 2003) was seven years to allow subsequent cycles to be the same as the five-year CRE cycle.

When the SAs are scheduling reviews, they must ensure that all SFAs are reviewed within the five-year SMI review cycle. Factors to consider when scheduling reviews include:

- Will SMI reviews of SFAs using NSMP or ANSMP be scheduled prior to or in conjunction with CRE reviews? This is to determine the number of menu items required on the day of review so that the reviewer can properly evaluate whether the SFA meets CRE Performance Standard 2 (service of reimbursable meals)?
- Will the SA schedule reviews of SFAs that change menu planning approaches (such as an SFA on food-based menu planning approach switching to a nutrient-based menu planning approach) soon after the implementation of the new approach?
- Will there be time within the cycle track to conduct follow-ups of the SMI reviews?
- Will there be time in the cycle to review new SFAs?

SAs may conduct SMI reviews:

- At the same time as the CRE review;
- In conjunction with technical assistance visits or CRE follow-up reviews; or
- Separately.

State agencies are encouraged to schedule SMI reviews of SFAs using a nutrient-based menu planning approach either prior to or during, a CRE review. This provides the CRE reviewer assurance that the SFA is correctly operating their menu planning approach and that the planned meals are reimbursable. Therefore, the reviewer would be able to determine what menu items must be offered on the day of the CRE review and what students must take.

Assessing Quantitative Aspects of SMI Review

The quantitative aspect of an SMI review relates to evaluating the measurable amounts or levels of specific nutrients, total calories, and calories from total fat and saturated fat in planned menus. The nutrient analysis is used to assess the quantitative levels of nutrients and calories in the planned menus. During the SMI review, the State agency follows different procedures to assess an SFA's compliance with the quantitative aspects of nutrition standards depending upon the menu planning approach used by the SFA.

Who Conducts the Nutrient Analysis?

Food-Based Menu Planning Approaches

1. The State agency conducts the nutrient analysis based on regulatory requirements and follows USDA's *Nutrient Analysis Protocols*. A nutrient analysis must be performed for each age/grade group used by the review school for menu planning.

OR

2. The State agency will accept the SFA's nutrient analysis when the State agency validates and accepts the nutrient analysis completed by the SFA in accordance with regulations and the Nutrient Analysis Protocols..

The process of conducting or validating a nutrient analysis is discussed further in Chapter 3.

Nutrient-Based Menu Planning Approaches

1. Schools using either the NSMP or the ANSMP approach are *required* to conduct nutrient analyses of their menus, prior to serving the meals. The analyses become the basis of determining reimbursable meals.
2. During an SMI review, the SA reviewer will review and validate the nutrient analysis conducted by the SFA (NSMP) or contractor (ANSMP). The process of validating the nutrient analysis is explained in Chapter 3.

The State agency may establish additional guidelines for new SFAs on NSMP/ANSMP or for an SFA that indicates a desire to switch to NSMP/ANSMP, such as requiring documentation of nutrient analyses prior to the SA's approval of the menu planning approach.

Assessing Qualitative Aspects of SMI Review

While a nutrient analysis measures compliance with *quantitative* standards such as RDAs, calories, and percent of calories from fat and saturated fat, other *Dietary Guidelines* recommendations, such as “Eat a variety of foods,” do not lend themselves to quantitative measurements. Other nutrition goals, such as “Choose a diet low in cholesterol” and “Choose a diet moderate in salt and sodium”, while measurable, do not have regulated target levels.

SAs have the option to establish State levels of these dietary components although they are not required or encouraged to do so. The 1995 *Dietary Guidelines* did not set levels for these dietary components. Several national health and/or other Federal government organizations such as the National Research Council, the Food and Drug Administration’s (FDA) Nutrition Facts Label, American Heart Association, and National Heart, Lung and Blood Institute have established levels for sodium, cholesterol, and dietary fiber. *The Nutrient Analysis Protocols*, Appendix A, provides a listing of these recommendations.

The SMI goal is to *decrease* cholesterol and sodium levels and *increase* levels of dietary fiber in school meals, over time.

The reviewer must take into account all efforts of the SFA to meet the overall goals of the *Dietary Guidelines*, including recommendations without a specific measurement.

For example, a school using NSMP/ANSMP is not required to offer specific *quantities* of fruits and vegetables to meet minimum daily and weekly totals. However, the *Dietary Guidelines for Americans* recommends, “Choose a diet with plenty of whole grains, fruits, and vegetables.” If menus do not offer servings of fruit and/or vegetable daily or frequent servings of whole grains, the reviewer should:

- Discuss the importance of including fruits and vegetables on a daily basis,
- Discuss the importance of whole grains, and
- Include this as part of recommendations.

The guidance and **prototype SMI review forms** encourage reviewers to discuss various aspects of the foodservice with the SFA staff, including nutrition education activities and training, recipe modification, food preparation techniques, and the school nutrition environment. Reviewers should assist SFAs with developing additional ways to meet the nutrition standards, including qualitative recommendations.

The print versions of the SMI review forms and instructions are included with this guidance as the *Forms Supplement to the SMI Reviewer’s Guide*.

The On-Site Review

While not specifically required by Federal regulations, an SMI on-site review is the means to **validate** the SA's or SFA's nutrient analysis of planned school meals and is highly recommended. The review allows the SA to observe the SFA/school's foodservice operation and determine if the served meals reflect what was planned and analyzed. This is a critical step to ensuring an accurate SMI review. While on-site, the reviewer can:

- 1) Observe the meal quality, appeal, and the level of students' acceptance.
- 2) Observe food production to determine if:
 - a) standardized recipes are followed,
 - b) food products or ingredients are the same as those analyzed in the menus, and
 - c) foods are prepared and stored safely.
- 3) Observe meal service to:
 - a) determine if appropriate portion sizes are planned (i.e., is the amount reasonable/normally consumed by students, especially for self-serve condiments),
 - b) identify if food/menu items are served as planned,
 - c) determine if the portion sizes served are the same as that analyzed, and
 - d) ensure that Offer versus Serve is implemented correctly for the menu planning approach.
- 4) Observe all food and beverages available to students in the cafeteria.
- 5) Interview key foodservice staff, administrators, and students to:
 - a) discuss food procurement and receiving practices,
 - b) discuss food preparation and meal service practices, and
 - c) determine level of nutrition education and nutrition policies in the schools.

SMI Reviews for Residential Child Care Institutions (RCCIs)

The foodservice operations in many RCCIs may be quite different from those encountered in more traditional school settings. RCCIs also differ greatly from each other: some may be correctional institutions, some may accommodate children with special health care needs, while others may have small group homes where students prepare the meals.

RCCIs must show that meals meet the appropriate meal requirements. In most cases, RCCIs should have production records and standardized recipes to document meal accountability and allow the SA to conduct a valid nutrient analysis. For some RCCIs, formal food production records may not be available. However, for meals to be reimbursable, there still must be some form of documented menu records to show planned menu items, projected serving sizes for planned meals, actual menus served, and number of meals served. These records would then be used to conduct the nutrient analysis. Recipes for planned menus should be available and used to make sure that quality and nutritious meals are served and that the quantity is sufficient for reimbursable meals.

For meals to be reimbursable, the RCCI administration must provide necessary guidance/supervision to children who prepare their own meals to ensure that the planned

menus (menu items and portion sizes) are followed. In addition, children should be adequately supervised in preparing and serving meals because of safety and sanitation issues.

RCCIs are, in many situations, the sole providers of meals to their enrolled children and, as a consequence, must recognize and assume the complete responsibility for providing an adequate total diet for these children. While flexibility is important, the reviewer *must* keep in mind the institution's responsibility to ensure proper nutrition for the child.

Summary of the SMI Review Process

The SMI reviewer must perform a series of activities to adequately assess the SFA's level of compliance with the SMI regulations. The steps listed below are vital in the review process to help the reviewer accurately evaluate the SFA's level of compliance, to provide appropriate technical assistance, and to assist the SFA in developing an effective corrective action plan.

1. Prepare for the SMI review:

- Select the SFA.
- Select the school(s).
- Inform the SFA about the pending review.
- Gather preliminary SMI information from the SFA.
- Prepare for the entrance conference.

2. Conduct the SMI review:

- Conduct an entrance conference with the SFA.
- Conduct an on-site visit of the school/SFA for each type of menu planning approach used.
- Conduct or validate the nutrient analysis.²
- Prepare the Summary of Findings and discuss with SFA.
- Assist the SFA to develop the corrective action plan (CAP), outlining activities, persons responsible, and timeframes.
- Identify follow-up activities.
- Conduct an exit conference with the SFA.

3. Post-review activities:

- Follow up as needed to ensure that the SFA completes the CAP in a timely manner.
- If the CAP is not completed in a timely manner, determine if the SFA is acting in good faith. Renegotiate the CAP, if warranted. Determine if fiscal action is warranted.
- Determine when to close the SMI review based on satisfactory completion of the corrective action plan.
- Ensure proper documentation and record retention.

² Timing may vary. This may occur before, during or after the On-Site Review.

The steps in the SMI review process will be discussed in detail in the following chapters. Also, refer to Appendix N, Flowchart of SMI Review Process for State Agencies. This attachment provides the reviewer with a graphic overview of the review process for food-based and nutrient-based menu planning approaches.

Chapter 2: Preparing for the SMI Review

Steps to Get Ready

Preparing for the SMI review takes some time and organization. The following steps will assist the reviewer in preparing for the review.

The SA reviewer should:

Step 1: Select the SFA based on the State agency's five-year SMI review cycle. State agencies may prioritize their yearly review list based on the menu planning approach used (SFAs using NSMP and ANSMP may be done early in the school year prior to the CRE if both reviews follow the same cycle), previous SFA review findings, and other factors that the State agency has identified. 7 CFR Part 210.19 requires that each SFA be evaluated at least once every 6 years.

Step 2: Select the school(s) to be reviewed. At a minimum, the reviewer must conduct one SMI review for each menu planning approach used in the SFA. Choose a different school during each SMI cycle. The reviewer may select more than one school to review—particularly when the SFA is large, offers different menus for different schools, or has multiple production kitchens—in order to have a more representative sample. A different type of school than was reviewed in the previous cycle should be chosen (e.g., if an elementary school was reviewed during the last cycle, choose a high school). Other school selection criteria may include:

- School foodservice director's recommendation
- Different menu choices in schools
- Serving line methods (kiosks, scramble, food bars, etc.)
- Mix of age/grade groups in a school
- High/low school meal participation

Step 3: Inform the SFA about the pending review. The SMI review process requires a considerable time commitment from the SFA as they gather a variety of documents for the reviewer. Due to turnover of staff, this could be the first SMI review for the foodservice director. For these reasons, it is important for the

reviewer to communicate effectively with the SFA and provide information in a timely manner.

Prior to the review, the reviewer should:

- Contact the SFA to inform them about the upcoming review, establish the dates for the review, and schedule a time and place for the entrance conference. Direct the SFA foodservice director to the *SMI Road to Success*, Chapter 6, which provides an explanation of materials needed for the review.
- Send the SFA a notification letter, *SMI Fact Sheet*, and the *Checklist of Materials Needed for the SMI Review* (Appendix F, SMI-1, 2 and 3).

Step 4: Gather the preliminary information on the SFA. Complete the *SMI School Food Authority/School Profile* (SMI-4). Information collected from the SFA/School Profile form will help the reviewer to conduct a more accurate nutrient analysis. The reviewer can obtain this information from SA documents and/or by contacting the SFA directly. The SA should also obtain records from any previous SMI review of the SFA.

Step 5: Prepare for the entrance conference. Once the reviewer has confirmed the review dates and completed the SFA/School Profile, he/she can prepare for the entrance conference by studying previous review findings, related improvement/corrective action and follow-up, preparing SMI review forms, and gathering information for the review.

What Types of Information are Gathered?

The prototype SMI review forms, located in the *Supplement to the Reviewer's Guide to SMI*, are designed to give the reviewer a comprehensive set of documents to compile the necessary data, information, and observations to formulate a realistic and practical evaluation of the SFA's nutrition program and subsequently provide guidance for developing effective improvement plans.

The SMI review forms are available on our website. These forms can be downloaded into the State reviewer's laptop computer for use in the field while conducting a review.

Several of the review forms are specific to either a food-based or a nutrient-based menu planning approach. Some of the forms are general and are used for all menu-planning approaches.

The print-version of the forms and instructions, located in the *Supplement to the Reviewer's Guide to SMI*, include:

SMI-1	Prototype SFA Notification Letter (All Menu Planning Approaches)
SMI-2	SMI Fact Sheet (All Menu Planning Approaches)
SMI-3	Checklist for SMI Review (All Menu Planning Approaches)
SMI-4	SFA/School Profile (All Menu Planning Approaches)
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SMI-14	Corrective Action Plan for School Meals (All Menu Planning Approaches)
SMI-15	Follow-Up Tracking Report (State agency report)

State agencies may adapt these forms to meet their individual needs as long as the modified forms include all required review areas.

Points to Remember

- Refer to special instructions and tips in the review form instructions. Guidance and special instructions are included to assist the reviewer in completing the review.
- The forms include questions to help the reviewer better assess compliance with both the nutrition standards and the selected menu planning approach, and provide appropriate technical assistance.
- Nutrient analyses are based on planned menus and planned portions for nutrient-based menu planning. The State agency reviews production records to determine if meals offered reflected the analysis of planned menus, including menu items and portion sizes, and to verify dates of substitution(s). For State agency analysis of food-based approaches, the reviewer analyzes menus that are offered according to the food

production records. For any menu planning approach, the reviewer must validate the accuracy of the school's production records.

- Current SMI regulations do not include quantitative standards for cholesterol, sodium, and dietary fiber, because neither the RDAs nor the 1995 *Dietary Guidelines* provided target levels. However, reviewers should collect this data and record it with the results from the previous data to evaluate whether cholesterol and sodium levels are decreasing, while dietary fiber levels are increasing.
- A “Summary of Findings” is included with the review forms to assist in formulating the Corrective Action Plan (CAP).

An SMI Follow-Up Report (SMI 15) is included with the forms to assist the SA in tracking required documentation of follow-up activities to the CAP.

Chapter 3: Conducting the SMI Review

The Entrance Conference

The entrance conference establishes the expectations of the SMI review. The time and location of the entrance conference should be determined when the State agency contacts the SFA to schedule the SMI review.

Possible entrance conference attendees include:

- Superintendent or other authorized representative
- Foodservice director
- Principal(s) at selected school(s)
- Manager or head cook at selected school(s)
- State agency reviewer(s)

Suggested entrance conference agenda:

- Explain the purpose of the review; summarize information from the *School Meals Initiative Fact Sheet* (SMI-2).
- Discuss findings from previous review(s), prior Corrective Action Plan(s)/SFA corrective action(s) taken.
- Describe the review process—including the nutrient analysis, the SMI review forms, the Corrective Action Plan, and when fiscal action may be taken. (SA reviewer should refer to Appendix C for background information on fiscal action.)
- Name the specific school(s) selected and the criteria used to select the school(s).
- Specify the review week, including menu(s) to be reviewed (lunch and/or breakfast and age/grade groupings).
- Discuss the date, time, and location of on-site visit(s).
- Discuss procedures to use upon arrival at the school(s).
- Determine whom to contact in the foodservice area.
- Discuss whom to contact when questions arise.
- Establish a time and place to discuss review findings with the foodservice director and the development of a corrective action plan, if needed.
- Establish time and place of exit conference and who will attend.

The On-Site Review of the School/SFA

An on-site review provides the SA with the ability to determine if the SFA is implementing its menu planning system correctly and to collect and/or confirm information needed to conduct

or validate the nutrient analysis. The on-site visit also helps the SA to evaluate non-quantitative aspects of the SMI, e.g., efforts the SFA/school is making toward improving the school nutrition environment.

The on-site review may be done prior to the nutrient analysis or may be scheduled after the SA has conducted or evaluated the nutrient analysis of the SFA. If the SA has to visit the school to obtain missing nutrient information or information about the preparation methods, then the analysis may take place after the on-site review.

If the nutrient analysis will be conducted prior to the on-site review, it is helpful to schedule the on-site review on a week where a repeat of the menu that was analyzed can be observed. This is not always possible, because of scheduling conflicts, but allows the reviewer to validate the actual analysis.

Factors that will affect the on-site review procedures and the nutrient analysis methodology

Number of Menus/Menu Variations/Modifications to the Menu Planning Approach

Prior to the on-site review, the reviewer will need to become familiar with the SFA's/school's menu planning approach(es). Use the School Profile Form (SMI-4) to identify the approach(es) and any modifications.

For all menu planning approaches, the reviewer should determine if the age/grade grouping(s) and menu modifications as implemented match the information provided by the SFA. For NSMP/ANSMP, compare the age/grade groupings to the SFA's nutrient analysis and determine if the analysis was conducted based on the actual age/grade groups used in the SFA.

Food Preparation Site

The location and method of foodservice operation will affect the reviewer's approach:

- **Central kitchen:** A central kitchen is one where bulk foods are prepared—usually for the entire school district. The central kitchen can be a cook-chill operation where recipes are prepared in bulk, packaged and/or preportioned, and chilled until delivered to the schools. Menu or food items will generally be prepared in bulk for many more servings than needed for the school(s) selected for review. The reviewer will need to evaluate the recipes as they are prepared in the central kitchen to ensure the recipes are being prepared according to the standardized recipes.

Another consideration is that the school(s) may be required to do partial recipe assembly. For example, an SFA has a central cook-chill operation where recipes are prepared in bulk, such as Meat Sauce. The SFA delivers the chilled meat sauce,

packed in a bulk container, to the school. The school is required to prepare the pasta to serve with the meat sauce and a garden salad on-site. This SFA needs to have two types of standardized recipes on file:

- Central kitchen bulk recipes for items prepared in the central operation, and
- School recipes, for food or menu items prepared and/or assembled at the school.

The reviewer should review preparation at both sites to determine if the standardized recipes are being followed exactly and to see if menu items are prepared, assembled, and served as planned.

- **On-site preparation kitchens:** All food for the school is prepared on-site. The reviewer will be able to observe meal preparation and service at the same school.
- **School kitchens that satellite:** Some schools selected for review may be satellite schools, i.e., food is not prepared at the site but prepared at another school kitchen and delivered to the school. The reviewer should visit the actual kitchen where food is *prepared* to evaluate if standardized recipes are being followed.

Partial preparation is often also done at the receiving schools, as well as full preparation of selected menu items. In addition to visiting the school where food is prepared, the reviewer will also need to visit the satellite or receiving school(s) selected for the review to see if menu items are assembled and served as planned.

The reviewer will therefore need to review two types of standardized recipes:

- Recipes that are prepared at the base kitchen.
- Recipes prepared and/or assembled at the satellite school.

Food Preparation Methods

The SA will need to observe procedures for food preparation and answer the following questions:

- Are standardized recipes being followed exactly? Observe meal preparation and interview school foodservice staff to determine if there is any deviation from the standardized recipes.
- For USDA recipes, are alternate or optional ingredients used, or have other modifications been made? Is this information clearly provided to school foodservice staff?

Food or Menu Items

At the school site, the reviewer will determine if food or menu items match the planned menus and portion sizes and how menu substitutions/leftovers are handled and recorded. For

NSMP/ANSMP schools, the reviewer will determine how the SFA/school documents when the need for substitutions was known. Is the record complete? Is it up-to-date?

Food Storage Areas

Are food ingredients the same as information obtained from the central office? Check the storeroom and refrigerated areas to review the food items in inventory to see if they are the same products that have been or will be analyzed.

For FBMP schools, if food items in storage are different from the information recorded on the Production Record, the reviewer will need to determine whether that item was served during the week of the nutrient analysis and/or review week. It may be necessary to review old invoices/inventories to determine what was served during the week; if the item currently in storage is different from the item served during the analyzed week, the reviewer will need to obtain correct nutrient analysis data.

For NSMP schools, the reviewer will be validating the nutrient analysis conducted by the SFA. Either before or during the on-site visit, the reviewer will review the nutrient analysis against the food production records and note any discrepancies. When on-site, the reviewer will determine if foods in storage match items used for the nutrient analysis, documented on the Production Record and note and resolve any discrepancies. It may be necessary to review old invoices/inventory records. In resolving discrepancies, the reviewer may need to ask the following questions:

- Was the different item a substitution?
 - ✓ Was it noted on the Production Record as a substitution?
 - ✓ Did the SFA/school document the date the need for a substitution was known?
- Was the SFA working out small amounts of old inventory after reanalyzing for a new bid cycle?
- Did the SFA fail to reanalyze their menus when they received new or different food items after a new bid cycle?

Meal Service

Compare the Planned Menu to the Served Menu

Compare the planned menu/analyzed menu (menu/food items and condiments) to the served menu. Were all planned/analyzed menu items included in the menu offered to students?

Were any menu/food items and/or condiments, which were not on the menu, included in the nutrient analysis offered as part of the reimbursable meal?

Review Planned Menu Portions to Served Portions

Review portioning of menu/food items and condiments during service to ensure they are the same as portions recorded on food production records.

- **Items portioned by staff:** An on-site visit to the kitchen where food items are being portioned, and/or observations at the school where items may be portioned during meal service provides the opportunity to evaluate whether portion sizes are actually being served as reported on production records and/or used for the nutrient analysis. Observe scoops, ladles, etc. used for portioning.

If there is a question as to whether the menu items have been correctly portioned, the reviewer should compare the amount of the food item prepared, and the number of servings portioned of the food item to the yield tables in the *Food Buying Guide* to determine if the portion sizes have been correctly measured.

For example, the reviewer notes that $\frac{1}{2}$ cup of French fries is indicated as the portion on the food production record, but the serving to students appears larger. By determining the number of servings obtained from the total amount of French fries prepared, the reviewer can calculate the actual portion size served.

- **Pre-portioned items:** Observe pre-portioned items such as condiments, salad dressings, etc. Portions of these items can vary according to the manufacturer and within the same manufacturer. The reviewer must ensure that what is being analyzed compares to what is being offered to students.
- **Self-serve, food items, and food bars:** During the on-site evaluation, observe whether students and cashiers understand the portion sizes for self-service items. Review the information provided to the students and cashiers. Is the minimum serving size(s) posted?

There are two types of self-serve bars.

- ▽ **All the food items on the bar are considered to be one recipe and therefore make up one menu item.** An example is a salad bar. With the self-serve situation, the student may select any or all the food items from the self-service bar to equal at least the minimum serving size for the item to count for a reimbursable meal. When this is the case, any kind of serving utensil may be used—tongs, spoons, scoops, etc.—it is the total amount selected from the bar that counts. The school can inform students of the minimum serving size by posting the minimum portion that must be taken and by setting out a simple minimum-sized portion that can serve as a visual example to the students of the minimum amount that must be taken. The cashier must be able to judge visually if the portion the student takes equals the minimum portion size. The reviewer must review the standardized recipe for the bar to determine the *planned* portion size. For example, the total planned portion size for the bar may be one cup. The students and cashier must understand that the student must leave the serving line with one or more food items that equal one cup to count as a reimbursable food item.
- ▽ **One or more individual food items on the bar have designated serving sizes.** For example, the planned portion sizes for a potato bar may be 1 small potato, 2 oz. cheese and ham (preportioned) and $\frac{1}{4}$ cup other vegetable. Each item on the bar counts as *part* of a reimbursable meal. Students must leave the serving line with the planned portion size of the chosen food item to be reimbursable. In this case, the serving utensil is important to help the student take an amount that will

count toward a reimbursable meal. The reviewer must observe the sizes of the scoops, ladles, and other measuring devices used for portioning to see if they are the correct size for the planned portion.

Offer versus Serve

Determine if Offer versus Serve is implemented according to the requirements of the menu planning system.

Complete these forms during the on-site visit:

- *SMI-7 On Site Menu Documentation*
- *SMI-8 On Site Review*
- *SMI-9 Evaluation of Planned Menu*
- *SMI-10 Summary of Training Needs*
- *SMI-11 Nutrition Education and Policies*
- *SMI-12(a) Food Safety Review or*
- *SMI-12(b) Food Safety Checklist*

Conducting the Nutrient Analysis

Food-Based Menu Planning Approach

The reviewer will conduct the nutrient analysis of a selected school that uses one of the food-based menu planning approaches, Traditional or Enhanced. If the SFA is on one of the food-based options—but conducts its own nutrient analysis and wants the State agency to accept its nutrient analysis—the State agency will follow the procedures described under the section, “Validating the Nutrient Analyses for NSMP/ANSMP”.

Consider the Following Points Before Conducting the Nutrient Analysis:

- 1) Does the reviewer have all the necessary information? Refer to the SMI-5(a) review form.
- 2) Which age/grade grouping(s) does the SFA use to plan menus? Which age/grade grouping(s) are used in the school(s) selected for review? Confirm with the foodservice director.

- 3) Determine which nutrient standards to use for the analysis based on:
- The SFA’s menu planning approach;
 - The school(s) age/grade groupings; and
 - Any allowable modification to the food-based menu planning approach, including approval documentation from the State agency, if required. (Refer to “Nutrient Standards and Available Modifications,” Appendix A.)

State agencies will review schools against the nutrient standards for the menu planning approach being implemented by the school, including the approved modifications to Traditional Food-Based. State agencies **may not develop or customize a nutrient standard** for the particular grades or ages of the school selected for the SMI Review.

For example, if an SFA uses Group IV (Grades 4-12) in the Traditional Food-Based Menu Planning approach to plan menus for all grades in the SFA, the SA *must* use the 4-12 grade group nutrient standards—regardless of the grades of the school chosen for review—*unless* the SFA has opted for the approved modification to the Traditional Menu Planning Approach. This modification allows schools to offer portions based on the 4-12 meal pattern to students in Grades K-6 and/or 7-12 but use the nutrient standards for Grades K-6 and 7-12 respectively. Remember, although one representative school is chosen for review, the SA is determining if children in all grades within the SFA age/grade groups are meeting the nutrient standards.

How Many Nutrient Analyses are Required?

The number of menus the reviewer needs to analyze and/or review depends on the number of age/grade groups and the number of menu variations the SFA uses for planning the menus at the school(s) selected for review.

- **One age/grade menu in the school:** The menu planner has developed centralized menus with the same meal pattern served to all students in specific grades, such as K-3, and 4-12. If the reviewer selects a school with grades that exactly reflect the SFA’s grade grouping for menu planning, the reviewer would need to conduct a nutrient analysis only for the central age/grade grouping.

For example, an SFA using the Traditional Menu Planning approach has a central menu and uses the K-3 grade grouping for all schools with grades K-3. A school is selected for review that has only students in Grades K-3; therefore, the SA will analyze the menus at the selected school using the K-3 nutrient standards.

- **Multiple age/grade groupings in the school:** The menu planner has one set of central menus and varies portions sizes for different age/grade levels. Because nutrient levels differ according to the meal patterns for different age/grade groupings, if the school(s) selected for review has multiple age/grade groupings, an analysis and review of meals planned for each age/grade group in the school must be conducted.

For example, an SFA on the Enhanced Menu Planning approach plans menus for students in K-6 and 7-12. A K-8 school is selected for review. Two menus will be analyzed—the

menus for Grades K-6 (using the K-6 nutrient standards) and the menus served to students in Grades 7-8 (using the 7-12 nutrient standards).

- **Multiple menus in the school:** It is possible that the school(s) selected for review may provide different menu offerings to different age segments of students, within the same school. For example, a school on the Enhanced Menu Planning Approach with Grades K-6 may only offer a fruit and vegetable bar to the older students, Grades 4-6. One nutrient analysis must be conducted for Grades K-3, without the fruit and vegetable option (using the K-6 nutrient standards); and another analysis must be conducted for menus offered to Grades 4-6, with the fruit and vegetable bar option (using the K-6 nutrient standards).

Steps in Conducting the Nutrient Analysis: An Overview

1. Gather all the materials and information needed to conduct the nutrient analysis for the selected review week. These materials include food production records, standardized recipes, descriptions or specifications of all food products, and nutrient information of foods not included in the software database.

When the nutrient analysis is done prior to the on-site review, the reviewer should request the SFA/school's menus, food production records, and other documentation several weeks ahead of the dates these materials are needed. Gathering all the requested information is a critical part of this process but can be lengthy, especially if the SFA or school has not been retaining all needed documents, such as nutrition facts labels. A phone number of an SFA contact person to call for additional information is essential.

2. Enter nutrient analysis data gathered from the above materials into the computer.
3. Generate the nutrient analysis report for the review week.
4. Interpret the analysis; note whether the weekly average meets standards for all nutrients and calories; look at daily averages; compare all values with previous SMI review nutrient analyses (if available).
5. Fill out the SMI-6 (a), *FBMP Nutrient Analysis Report for Lunch* and/or the SMI-6 (b), *FBMP Nutrient Analysis Report for Breakfast*, or attach the nutrient analysis to these forms after completing the nutrient analysis.

For more detailed information on conducting nutrient analyses, refer to USDA's guidance publication, *Nutrient Analysis Protocols: How to Analyze Menus for USDA's School Meals Programs*.

NOTE: To conduct a nutrient analysis, the SA uses the data from the review schools' production records to obtain the number of reimbursable meals prepared for service. Menu items prepared for reimbursable meals and entered into the computer should *not* be in excess of the numbers that yield one meal per eligible student per day. The numbers of excess menu items/meals must not be included in the nutrient analysis.

To validate portion sizes used in the nutrient analysis, the reviewer should observe the meal service during the on-site visit to observe the portion sizes of food items served to students (as indicated on food production records) *if* the menu is the same as one during the review week.

However, the menu observed during the on-site visit may be different from the review week menu. In this case, the reviewer should observe serving lines and interview the staff to determine if they served the correct portions according to the standardized recipes for the menu served during the on-site visit. If portion sizes were incorrect, the reviewer should determine why this occurred and if it is a systemic problem. For example, the cook did not follow the standardized recipe and did not prepare a sufficient amount of a menu item to serve the number of students for that meal. The accepted remedy, according to the staff, would be to serve smaller portions. This would be a systemic problem and any data on the production records for number of portions and portion sizes would be invalid.

The nutrient analysis can be conducted before, during, or after the on-site review. However, if the nutrient analysis is conducted before, it may have to be revised based on findings of the on-site review.

Validating the Accuracy of the Nutrient Analysis for NSMP and ANSMP Reviews

Nutrient-Based Menu Planning Approach

For NSMP/ANSMP, the SFA/school is required to conduct a nutrient analysis of planned meals. When the State agency selects an SFA that is using the NSMP/ANSMP approach for review, the reviewer will be validating the nutrient analysis conducted by the SFA rather than conducting a nutrient analysis. The reviewer is strongly encouraged to visit both the SFA's office, if this is where the nutrient analysis is conducted, and also the SMI review school to validate: 1) if the SFA is appropriately performing the nutrient analysis and, 2) if the school is offering the menu items/condiments as planned/analyzed, following standardized recipes, and serving planned/analyzed portions.

These are the procedures required to validate the nutrient analysis.

- 1. Obtain a copy of the menus,** including portion sizes.
- 2. Obtain a copy of the nutrient analysis.** Determine if USDA-approved software was used for the analysis.
- 3. Obtain the necessary information to validate the nutrient analysis:**
 - ✓ All food production records for the school for the week of review.
 - ✓ If SFA analyzes central menus and uses weighted averages, the reviewer will need to see production records for the review week for all schools with similar

age/grade grouping(s). This will be necessary to validate that the projected number of servings of the menu items was aggregated and weighted correctly for the applicable schools. See the following section “Validating an SFA’s Weighted Nutrient Analysis” for further discussion of this process.

- ✓ All standardized recipes used at the school(s) during the week of review.
- ✓ The SFA’s food descriptions or specifications for food items or ingredients used during the week’s review.

Examples of Specifications:

Ground beef, frozen OR
Milk, unflavored, 1% Like IMPS 136 low-fat
No more than 20% fat

School districts should be able to provide specifications for each food product. The reviewer may need to review past invoices to determine products that were delivered. This allows the reviewer to ensure that the correct ingredients are selected when conducting nutrient analysis.

- ✓ All of the Nutrition Facts Labels or Manufacturer’s Nutrient Data Submission Forms for appropriate food items.
- ✓ Documentation of substitutions, including documentation of the date the need for each menu substitution was known.

- 4 Determine if the SFA is using appropriate age or grade groupings for the school(s).** Review and evaluate the nutrient analysis for each age/grade group of the school(s) selected for the week of the review. The SFA must have completed an accurate nutrient analysis for each age/grade group and menu throughout the SFA. Although one or more schools will be selected for the SMI review, the reviewer must determine if the SFA is correctly implementing the nutrient-based approach throughout the SFA. Therefore, the reviewer should ensure that a nutrient analysis has been completed for all age/grade groups in the SFA using a nutrient-based approach.

Remember: Schools selected for review are considered as representative of the SFA’s implementation of the menu planning approach.

- 5. Determine if the SFA’s data entry of food items/ingredients, recipes, and menu items are correct.** Make sure the correct items were selected from the database, conversion of raw foods to cooked yields was done correctly (use of yield factor method), and the correct weight or volume measures were selected. Refer to the *Nutrient Analysis Protocols* for more discussion on these topics.

- 4. Determine if weighted or simple averaging was done correctly.** If the SFA conducts analyses on centralized menus and uses weighted analysis, the history of student food selections will have to be consolidated or aggregated from food preparation records in schools with the same age/grade groupings and menus.

Validating An SFA's *Weighted* Nutrient Analysis

The following steps are required to validate an SFA's nutrient analysis when the SFA uses a nutrient-based menu planning approach, plans central menus, and centrally analyzes menus for the entire SFA. Ask the SFA director or menu planner whether weighted averaging was used for the analysis and how the projected number of servings of each menu items was determined. The projected number of servings of each menu item should be based on the SFA's history of student selection for each menu item—within a comparable age/grade group and similar menu.

Step 1

- Select one day's menu from the week being reviewed or validated.
- Collect the production records for the selected day for those schools with the same age/grade groups that also use the same central menu.

Step 2

- Select one menu group available for the day to review as a test, for example, select the entrees.
 - Total the number of entrees that were served to students from all the food production records you have pulled. Total each entrée choice separately.

Step 3

- Compare these totals to the planned or projected number of servings for each entrée entered into the nutrient analysis software for the menu analysis.
- If the totals from the production records are not close to the projected number of servings entered for the nutrient analysis:
 - Determine the SFA's method for projecting the number of servings.
 - What dates of production records did the SFA use to determine the projected number of servings of each menu item?
 - If the aggregation of data is outdated, that is, it does not reflect current student selections, require that the SFA update the nutrient analysis using current information and recommend that the SFA re-analyze at least twice a year, using updated data.

Validating An SFA's *Simple Averaging* Nutrient Analysis

For nutrient analysis, simple averaging means giving equal weight to every menu/food item offered to students within each group of menu choices. If menu choices were offered, be sure that the projected total number of meals was based on a number evenly divisible by the number of selections within each group of menu choices. Be sure this number is the same every day to ensure that one day is not weighted more heavily than another day.

Three hundred is a number evenly divisible by up to six selections; 840 is the next evenly divisible number for selecting through eight selections.

Refer to Chapter 8 of *the Nutrient Analysis Protocols* for further discussion of the process of projecting the number of servings of each menu item for nutrient analysis using weighted or simple averages.

The reviewer will need to complete the SMI-5 (b) Nutrient Analysis Validation for NSMP/ANSMP as a way to document the SFA's nutrient analysis. The SA validates compliance with the nutrition standards by reviewing the SFA's nutrient analysis for all age/grade groupings and menus of the school selected for review—ensuring that the analyses were performed according to the *Nutrient Analysis Protocols*. Complete the SMI-6 (b) *NSMP/ANSMP—Nutrient Analysis Report*.

Assisting the SFA to Develop a Corrective Action Plan

Once the nutrient analysis has been conducted or the SFA's nutrient analysis has been validated and the on-site review completed, the reviewer should:

- **Identify** areas needing improvement or corrective action. Complete the SMI-13 *Summary of Review Findings*.
- **Select** a list of options and activities to correct the problems.
- **Develop** a list of suggested technical assistance resources and/or tools to assist the SFA/school.

In order to determine the appropriate activities for the corrective action plan, the reviewer must first identify the problem area(s), including the cause and the extent of the problem(s). It is important to meet with the foodservice director and other appropriate staff to communicate findings and suggest options for the corrective action plan. The SFA then develops the corrective action plan with the assistance and concurrence of the SA.

Steps to Developing the Corrective Action Plan:

1. **Determine the extent and cause of the problem(s):** The reviewer should look very carefully at each finding to establish whether it represents an isolated problem at the specific school or whether the finding results from a systemic, district-wide problem.

To determine whether the problem is **isolated** (non-systemic) or **systemic**, the reviewer may need to question the SFA representative and/or consider visiting more than one school in the SFA to observe if the problem exists in other settings. If the problem was an error generated by the central office, it may indicate a systemic problem across all schools.

Is the problem **simple** (one action can correct) or **complex** (requiring multiple action steps)? For simple isolated problems, the reviewer can suggest activities specific to the school where the problem occurred. For complex systemic problems, the reviewer should recommend activities and procedures to correct the SFA's menu planning approach and implementation as a whole.

For example, a simple, isolated problem may require training one cashier at the school reviewed. A complex, systemic problem might require district-wide training of students and cashiers in Offer versus Serve.

2. **Create the list of suggested activities to address specific findings:** Review activities listed in Appendices D-L. These lists provide some suggested activities that can be used in correcting areas of deficiency. The Resource Section of this manual will also provide a list of SMI resources for training in specific areas of noncompliance. This will provide a starting point for discussion when meeting with the foodservice director.
3. **Meet with foodservice director prior to the exit conference to:**
 - Discuss SMI-13 *Summary of Findings*.
 - Compare to last SMI review and discuss SFA's/school's progress toward meeting the nutrition standards and SMI requirements for the meal planning approach.
 - Identify strengths and weaknesses of the program.
 - Share findings and causes.
 - Suggest activities and options to improve the nutritional quality of school meals.
 - Discuss technical assistance resources/tools.
 - Refer the foodservice representative to the *SMI Road to Success: A Guide for School Foodservice Directors*, which can be used to explain areas of noncompliance and serve as a training resource for the SFA.
4. **Discuss need for a Corrective Action Plan:** If the reviewer identifies areas that need corrective action, the SFA must develop, with the assistance and concurrence of the State agency, a corrective action plan to rectify those deficiencies. The corrective action plan should include:
 - *Strategies* to bring the SFA into compliance with the SMI nutrition goals as quickly as possible.
 - *Specific activities designed to resolve problems.* When appropriate, propose small, practical changes over time, as the SFA may not be able to accomplish all the needed activities at once.
 - *The person(s) responsible for the activity.*
 - *Timeframes to accomplish the activities.* Prioritize activities and negotiate timeframes for completing them.
 - *Outcomes* to verify that actions result in improvement and/or correct the problems.

It is important to remember that the SFA, *with State agency concurrence*, determines appropriate activities and timeframes that will work best for the corrective action plan.

Timeframes for Corrective Action

The time needed to accomplish the improvement activities will vary from one SFA to another. Factors that could influence timeframes include:

- Systemic or non-systemic problem(s)
- Simplicity or complexity of problem(s)
- Seriousness of problem(s)
- Longevity of problem(s)
- Activities chosen
- Resources and expertise available to the school district, and
- Time remaining in the school year after the review (e.g. changes to an annual bid for milk may happen during the next bidding cycle or the following school year).

When Is Immediate Corrective Action Required?

The SA must exercise judgment in determining the seriousness of the non-compliance. If the reviewer determines that the SFA never completed the terms of its previous corrective action plan or that its actions did not fully and permanently correct previous problems, the SA should require **immediate corrective action**. In addition, certain non-compliant areas *require* immediate corrective action. These areas indicate serious regulatory violations and include:

- Insufficient documentation to conduct or validate the nutrient analysis
- Incomplete food production records
- Standardized recipes not used
- Meals not meeting meal pattern requirements (FBMP)
- No or inadequate nutrient analysis available for each appropriate age/grade group used by the SFA (NSMP/ANSMP)
- USDA's *Nutrient Analysis Protocols* not followed
- Nutrient analysis performed with a non-USDA approved nutrient analysis software (NSMP/ANSMP)
- Changes, other than emergency substitutions, in the menu items from those analyzed (NSMP/ANSMP)
- A significant percentage of menu items, recipes and ingredients were not entered correctly into the nutrient analysis software (NSMP/ANSMP)

An example of a serious, systemic problem with an SFA using a nutrient-based menu planning approach would be that the SFA failed to complete the nutrient analyses for all age/grade groups used for all of the menu cycles. The reviewer, in consultation with the SA, should require the SFA to complete the nutrient analyses by a *specific date* within a short timeframe. If an accurate analysis is not completed within the designated timeframe, the SA cannot continue to allow the SFA to serve non-reimbursable meals. The SA is strongly encouraged to require the SFA to switch to a food-based menu planning approach until the ability to perform an accurate nutrient analysis has been demonstrated.

Suggestions/Activities for Corrective Action

Appendix D includes specific activities to suggest to the SFA for its CAP. *The Road to SMI Success: Guide for School Foodservice Directors* provides a section of SMI resources and/or tools. The reviewer should determine the resources/tools that can assist the school district in implementing its corrective action activities.

The Exit Conference

The exit conference takes place at the end of the review process after the State reviewer and the school foodservice director agree upon a corrective action plan to remedy deficiencies in the school meals.

At the exit conference, the State reviewer will meet again with the school superintendent or designee, the school foodservice director, and/or other appropriate officials to summarize the review results and present the corrective action plan.

Agenda Ideas for the Exit Conference

1. **Provide Overview:** Update the participants by *briefly* reviewing the purpose of the review and the review activities. Reiterate that the goals of the SMI review are to assess how the SFA's efforts to improve school meals nutritionally are progressing, determine if the meals meet the SMI nutrition standards and goals, and to bring about corrective action if needed.
2. **Describe Progress:** Note what the SFA has done to implement the *Dietary Guidelines* and comply with the nutrient standards in the areas of menu planning, procurement, meal preparation and service, staff training, student and community involvement, nutrition education, and healthy school environment.
3. **Present Summary of Findings:** If appropriate, commend the SFA on any areas of noteworthy activity. Compare results of this review to previous SMI reviews to determine if the same problems still exist. Based upon observations, note the areas that require **immediate** corrective action (such as failure to serve reimbursable meals), those problems that may require fiscal action, and where **long-term** focus to improve the nutrition program is needed.

Additionally, there may be suggestions for improvement that the reviewer may offer—suggestions to assist the SFA in operating an improved program but not necessarily areas of noncompliance. For example, removing the saltshakers from students' tables is a suggestion.

4. **Review the Corrective Action Plan for School Meals:** Discuss the activities and timeframes that the school foodservice has agreed to do to ensure that healthy school

meals are offered to students. Obtain needed signatures and provide copies to the foodservice representative and other appropriate officials.

5. **Discuss Follow-up:** Note the need for follow-up, when it will be conducted, and whether it will be on-site, written, or through phone or electronic communication. Depending on the seriousness of the findings, the reviewer may schedule another on-site visit to verify the SFA's corrective action.

Chapter 4: Post Review Activities

Conducting Follow-Up Activities

Based on timeframes outlined in the corrective action plan, the reviewer will follow-up to determine if the SFA is performing the agreed upon activities in a timely manner.

Follow-up may consist of:

- Phone calls,
- E-mails,
- Facsimiles,
- Written documentation, and/or
- On-site visits.

The SMI-15, *State Agency SMI Follow-Up Report*, is an optional form that is completed automatically when using the electronic software program or can be completed by hand if using the printed forms. It assists the reviewer in documenting and tracking follow-up activities of an SFA prior to closing the review.

When an On-Site Follow-Up Visit May Be Appropriate

An on-site follow-up visit may be appropriate when it is the only way the reviewer can determine if the SFA has completed the corrective action. A follow-up visit to a school site(s) may be warranted for such deficiencies listed below:

- A significant percentage of recipes and ingredients were not entered correctly into the nutrient analysis software (NSMP/ANSMP).
- Failure to adequately perform nutrient analysis for all age/grade groups used for planning menus and/or for all menu variations (NSMP/ANSMP).
- Standardized recipes were not used (all menu planning approaches).
- Menus, recipes, or portion sizes that were analyzed did not reflect actual practices.
- Fiscal action is being considered.

This list is not meant to be inclusive, because the reviewer may be able to document corrective action by other means or may identify other deficiencies that would require a follow-up site visit to determine compliance with nutrition standards.

When an SFA Does Not Meet the Terms of the Corrective Action Plan

When the follow-up indicates the SFA is not accomplishing the agreed upon corrective action plan (CAP) activities according to their timeframes, i.e., not meeting the terms of the CAP, then it becomes necessary for the reviewer to make a determination of the SFA's "good faith" efforts.

Determine the reasons for non-compliance. Has the SFA made a good faith effort to implement the changes? Consider these questions when determining good faith effort:

- What steps has the SFA taken to correct the problems?
- What extenuating circumstances have prevented them from accomplishing their objectives, e.g. staff changes, budget shortfalls, etc.?
- Is the plan too ambitious?
- Is the SFA capable of implementing the menu planning approach?

When an NSMP/ANSMP school is unable to plan menus successfully based on accurate nutrient analyses, the reviewer may require the SFA to change to a food-based menu planning approach.

Renegotiate the CAP. If the SFA is working in good faith to comply with the SMI requirements, the reviewer and the SFA representative may re-negotiate the CAP, revising the activities as needed and establishing new timeframes. The reviewer may need to provide more training and technical assistance, offer additional resources, and monitor the SFA's progress more closely.

Determine good faith effort if the SFA does not complete the renegotiated CAP: If the SFA fails to accomplish the new activity(ies) and/or fails to meet the new time frame(s), the State must again determine the good faith efforts of the SFA, and may yet again renegotiate the CAP if warranted. However, repeated failures demonstrate that an SFA is *not* working in good faith to meet the SMI requirements. SFAs are expected to commit sufficient attention, staff, and resources to ensure that their Child Nutrition Program(s) are efficiently and effectively operated in compliance with all requirements.

Consider fiscal action: A first step in the fiscal action process may be to warn the SFA of impending fiscal action. While it is not a requirement, the SA may want to send a letter to an SFA before declaring that the SFA is not working in good faith. The letter would document the noncompliance and notify the SFA that failure to take immediate corrective action by a specific date will result in (1) a declaration that the SFA is not working in good faith to meet National School Lunch (and/or School Breakfast) Program requirements and (2) the assessment of fiscal action.

Decision to Take Fiscal Action

If the State agency determines that the SFA is not working in good faith to rectify the deficiencies identified during the SMI Review, the reviewer must determine if fiscal action is warranted.

The decision to take fiscal action is a judgment decision that the reviewer and appropriate SA staff must make including, if warranted, consultation with the FNS regional office. The decision is based on the severity and longevity of the areas of noncompliance. The following discussion is provided as guidance only.

It is the State agency's responsibility to ensure program integrity at the SFA level and to recover any funds not properly payable according to regulations. Regulations provide for the disallowance [7 CFR Part 210.19(c)] or withholding [7 CFR Part 210.24] of funds, if warranted, for failure to take corrective action to comply with the nutrition standards.

Appropriate Fiscal Action

When the State agency has determined that the SFA is not working in good faith to complete corrective action and that fiscal action is appropriate, the State must then determine what fiscal action is called for. Fiscal action should be proportioned to the extent (number) of the problem(s) and to their severity and longevity (duration).

Severity: Severity can be gauged by assessing the impact of the problem(s) on the nutritional quality/reimbursability of the school meals. The SA should use as a general guide the requirement that schools provide nutritious and well-balanced meals to all the children they serve [7 CFR Part 210.10(a)(1)]. Severe problems are those that keep children from receiving meals, which are reimbursable and/or meet the SMI nutrition standards. The following problems would be determined as severe:

- **For Nutrient-Based Menu Planning:**
 - Failure to conduct an accurate and complete nutrient analysis to plan menus for all established grade/age groups of the SFA
 - Failure to modify planned menus to meet the nutrient standards
 - Failure to offer/serve reimbursable meals
 - Failure to fully and completely correct problems identified on a previous review
 - Substitutions sufficient to render menu planning by nutrient analysis invalid
- **For Food-Based Menu Planning:**
 - Failure to plan menus to meet the appropriate meal patterns
 - Failure to offer/serve reimbursable meals
 - Failure to consider the need to meet nutrient standards in the planning of menus
 - Failure to fully and completely correct problems identified on a previous review

Longevity: Longevity would be determined by looking at the duration of the problem:

- Is the problem a recent development (within the last month or so)?
- Is the problem relatively recent (within the last school year)?
- Is the problem long standing (more than one year)?
- Is the problem one that was not corrected from the previous review?

Types of Fiscal Action

Fiscal action can take the following forms:

- **Withholding [7 CFR Part 210.24]:** Regulations permit the State agency to withhold Program payments, in whole or in part, to any SFA which has failed to comply with regulations or with FNS guidelines and instructions. The SA should withhold Program payments until the SFA takes corrective action satisfactory to the SA. After the SA accepts the SFA's corrective action, payment will be released for funds properly payable to the SFA.
- **Disallowance [7 CFR Part 210.19(c)]:** Within the constraints of the regulations, SAs shall use their own procedures to disallow reimbursement for Claims for Reimbursement not properly payable according to regulations. The SA shall maintain all records related to actions taken, and may request assistance from FNS in making claims determinations.

Recovering overpayment:

SAs can recover overpayments through (1) direct assessment; (2) offset of future claims; or (3) for unpaid Claims for Reimbursement, the SA can disallow payments by having the SFA submit a revised Claim for Reimbursement or by having the SFA adjust meal claim records to ensure that unfilled Claims for Reimbursement are correct when filed.

SAs may also disallow funds for failure to take corrective action in accordance with regulations.

Appendix C provides a brief summary of SFA responsibilities for SMI and the potential fiscal consequences if an SFA fails to complete corrective action. This information may be provided as a State agency handout at the Entrance and/or Exit conferences.

Determining When to Close the SMI Review

The SA can close the review when the SFA has satisfactorily completed the required corrective action plan activities, and the SA has verified their completion.

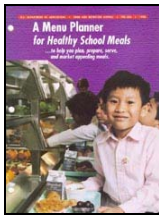

Record Retention

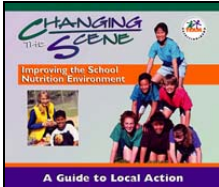
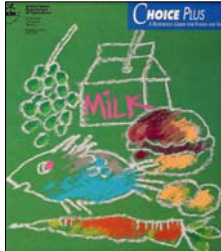
Regulations in 7 CFR §210.23(c) require State agencies to retain records for a period of three years after submission of the final Claim for Reimbursement for the fiscal year. SMI monitoring involves comparing the previous findings to current review findings to determine if the SFA is showing improvement in meeting the nutrition goals. For this reason, SAs are strongly encouraged to retain SMI review records past the three-year requirement to prepare for each subsequent five-year SMI review cycle. Alternatively, the SA could use an *electronic* tracking system, such as an Access database or any other electronic summary form to capture this data.




State agencies are strongly encouraged to retain SMI records past the three- year requirement for comparison of the previous review to the subsequent review to determine the progress of the SFA in meeting SMI requirements.



SMI

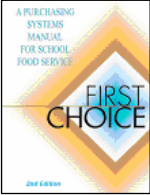
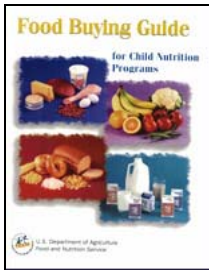
RESOURCES

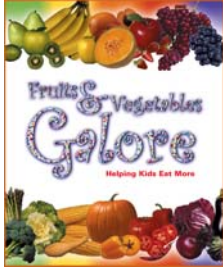
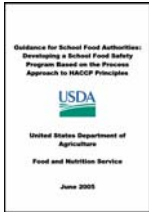
SMI Resources		
Resource	Description	Ordering, Downloading, and/or URL Information
<p>U.S. Department of Agriculture, Food and Nutrition Service, <i>A Menu Planner for Healthy School Meals</i>, 1998</p> 	<p>Manual presents the basic concepts of the School Meals Initiative for Healthy Children—and explains how to translate the concepts into real meals for real children in real schools.</p> <p>It will help you plan, prepare, serve, and market appealing meals.</p>	<p>http://schoolmeals.nal.usda.gov/Recipes/menuplan/menuplan.html</p>
<p>U.S. Department of Agriculture, Food and Nutrition Service, <i>Accommodating Children with Special Dietary Needs in the School Nutrition Programs – Guidance for School Food Service Staff</i>, 2001</p> 	<p>Guidance presents information on how to handle situations that may arise and offers advice about such issues as funding and liability. It also describes some of the factors which must be considered in the early phases of planning, and suggests ways in which the school food service can interact with other responsible parties in the school and the community at large to serve children with disabilities.</p> <p>Guidance is based on the policy guidelines outlined in FNS Instruction 783-2, Revision 2, <i>Meal Substitutions for Medical or Other Special Dietary Reasons</i>.</p>	<p>http://www.fns.usda.gov/cnd/Guidance/special_dietary_needs.pdf</p>



Resource	Description	Ordering, Downloading, and/or URL Information
<p>U.S. Department of Agriculture, Food and Nutrition Service, <i>Changing the Scene: Improving the School Nutrition Environment – A Guide to Local Action</i>, 2000</p> 	<p>Tool kit addresses the entire school nutrition environment including a commitment to nutrition and physical activity, pleasant eating experiences, quality school meals, other healthy food options, nutrition education and marketing the issue to the public. This kit can help local people take action to improve their school's nutrition environment.</p> <p>The kit includes a variety of tools for use at the local level to raise awareness and address school environment issues that influence students' eating and physical activity practices.</p>	<p>http://www.fns.usda.gov/tn/Resources/changing.html</p>
<p>U.S. Department of Agriculture, Food and Nutrition Service, with the National Food Service Management Institute, <i>Choice Plus: A Reference Guide For Foods and Ingredients Edition</i>, 1997</p> 	<p>This manual is resource on foods and ingredients to assist purchasers in developing food specifications consistent with nutritional goals and knowledge. Provides information to help program operators make informed decisions when purchasing products for use in school lunch and breakfast programs.</p>	<p>http://www.nfsmi.org/Information/choice_plus.htm</p>
Resource	Description	Ordering, Downloading, and/or URL Information

<p>U.S. Department of Agriculture, Food and Nutrition Service, with the National Food Service Management Institute, <i>Choice Plus – Food Safety Supplement 2003</i></p> 	<p>This resource gives guidance purchasing safe food. Discusses on-site visits to distributors, food recalls, safety language, food dating, manufacturer HACCP, and estimated product storage life.</p>	<p>http://www.nfsmi.org/Information/choice-plus-food-safety-supplement.pdf</p>
<p>U.S. Department of Agriculture, Food and Nutrition Service, <i>Commodity Food Fact Sheet Database</i></p> <p></p>  <p>http://www.fns.usda.gov/fdd/default.htm</p>	<p>Web page provides links to the online commodity fact sheets database maintained for all Food Distribution Programs. Each fact sheet gives a basic description of the available USDA product, suggested uses, preparation and storage tips, and nutrition information.</p>	<p>http://www.fns.usda.gov/fdd/facts/commodityfacts.htm</p>


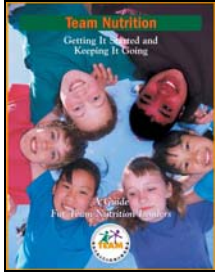
Resource	Description	Ordering, Downloading, and/or URL Information
<p>U.S. Department of Agriculture and the U.S. Department of Health and Human Services, <i>Dietary Guidelines for Americans</i>, 2005</p> 	<p>Guidelines are published every 5 years and provide authoritative advice for people two years and older about how good dietary habits can promote health and reduce risk for major chronic diseases. They serve as the basis for Federal food and nutrition education programs.</p>	<p>http://www.cnpp.usda.gov/dietary_guidelines.html</p>
<p>U.S. Department of Agriculture, Food and Nutrition Service, <i>Eat Smart. Play Hard.</i>™</p> 	<p>The web link to Eat Smart. Play Hard.™ is about making America's children healthier. It's about practical suggestions that will help you motivate children and their caregivers to eat healthy and be active. The Eat Smart. Play Hard.™ Campaign messages and materials are fun for children and informative for caregivers. To make your job easier, we have kid-tested the messages and based them on the Food Guide Pyramid and Dietary Guidelines for Americans.</p>	<p>http://www.fns.usda.gov/eatsmartplayhard/</p>

Resource	Description	Ordering, Downloading, and/or URL Information
<p>U.S. Department of Agriculture, Food and Nutrition Service, with the National Food Service Management Institute, <i>First Choice: A Purchasing Systems Manual for School Food Service</i>, 2nd Edition, 2002</p> 	<p>A resource to guide child nutrition professionals in their procurement procedures. Topics include steps in purchasing, the marketplace regulations, product movement, bid units, specifications, brand approval, receiving, and more.</p>	<p>http://www.nfsmi.org/Information/firstchoice/fcindex.html</p>
<p>U.S. Department of Agriculture, Food and Nutrition Service, <i>Food Buying Guide for Child Nutrition Programs</i>, 2001</p> 	<p>Tool to determine the contribution foods make toward the meal pattern requirements. It helps food service personnel to purchase the right amount of food and serve reimbursable meals (food based menu planning).</p>	<p>http://schoolmeals.nal.usda.gov/FBG/buyingguide.html</p> <p>To obtain a hard copy, contact FNS at:</p> <p>(703)-305-2609 or (703)-305-1624</p>

Resource	Description	Ordering, Downloading, and/or URL Information
<p>U.S. Department of Agriculture, Food and Nutrition Service, <i>Fruit and Vegetable Galore</i>, 2004</p> 	<p>This tool provides a wide range of information to directly assist schools in serving more fruits and vegetables in ways that motivate students to eat more fruits and vegetables. Resource includes three publications and five posters. Also included is a self-tutorial CD-ROM for Foodservice staff.</p>	<p>http://www.fns.usda.gov/tn/Resources/fv_galore.html</p>
<p>U.S. Department of Agriculture, <i>Guidance for School Food Authorities: Developing a School Food Safety Program Based on the Process Approach to HACCP Principles</i></p> 	<p>This document serves as USDA guidance for the implementation of HACCP-based food safety programs in schools participating in the National School Lunch Program (NSLP) or the School Breakfast Program (SBP). It identifies the minimum elements that must be included in a food safety program based on HACCP principles.</p>	<p>http://www.fns.usda.gov/cn/Lunch/Downloadable/HACCPGuidance.pdf</p>

Resource	Description	Ordering, Downloading, and/or URL Information
<p>U.S. Department of Agriculture, National Agricultural Library, <i>Healthy Schools Meals Resource Center</i></p> 	<p>Web link to the Healthy School Meals Resource System (HSMRS). The HSMRS, as USDA's Training and Technical Assistance Component, assists state and local school foodservice programs meet the <i>Dietary Guidelines for Americans</i>.</p> <p>By using this Resource System, school nutrition personnel and trainers can easily locate appropriate and useful training materials available for loan from the collection of the National Agricultural Library</p>	<p>http://schoolmeals.nal.usda.gov</p>
<p>U.S. Department of Agriculture, Food and Nutrition Service, with the National Food Service Management Institute, <i>Measuring Success with Standardized Recipes</i>, 2002</p> 	<p>Manual describes recipe standardization techniques in detail and includes examples, practice exercises, and reference materials. It is a “how-to” guide on recipe standardization for managers and cook-level employees. Includes a video and CD ROM.</p>	<p>http://www.nfsmi.org/Information/stdrecipes/complete.pdf</p>

Resource	Description	Ordering, Downloading, and/or URL Information
<p>U.S. Department of Agriculture, <i>Nutrient Analysis Protocols – How to Analyze Menus for USDA’s School Meals Programs</i></p> 	<p>This guidance manual establishes procedures to conduct an accurate nutrient analysis of school meals.</p>	<p>http://www.fns.usda.gov/tn/Resources/nutrientanalysis.html</p> <p>Copies will be distributed to state agencies and school food authorities with <i>The Road to SMI Success – A Guide for Foodservice Directors</i>, when that becomes available.</p>
<p>U.S. Department of Agriculture, Food and Nutrition Service, with the National Food Service Management Institute,</p> <p><i>Offer Versus Serve in the School Nutrition Programs</i></p> 	<p>The package contains training modules for each of the menu-planning approaches. Each module includes all the information and tools you’ll need to successfully train staff on OVS. The package includes a resource guide, training video, and training materials.</p>	<p>http://www.fns.usda.gov/tn/Resources/offer_v_serve.html</p>

Resource	Description	Ordering, Downloading, and/or URL Information
<p>U.S. Department of Agriculture, Food and Nutrition Service, with the National Food Service Management Institute, <i>Serving It Safe: A Manager's Tool Kit</i>, 2nd Edition</p> 	<p>Describes why food safety is important and gives guidance on how foodservice personnel can assure the preparation and service of safe foods. Provides information based on the 2001 Food Code.</p> <p>Package includes 119-page manual, 102-page instructor guide, and 25 1/2" x 33" English/Spanish posters. Instructor guide provides an outline for conducting 10 hours of group training.</p>	<p>http://schoolmeals.nal.usda.gov/Safety/safe.html</p>
<p>U.S. Department of Agriculture, <i>Team Nutrition—Getting It Started and Keeping It Going: A Guide For Team Nutrition Leaders</i></p>  <p>http://www.5aday.gov/</p>	<p>The guide focuses on the critical first steps in initiating and implementing Team Nutrition, and also provides how to's, ideas in action, available resources, and real world challenges and solutions identified by the USDA's Team Nutrition Demonstration Project participating States and their schools.</p>	<p>http://www.fns.usda.gov/tn/Resources/gettingitstarted.html</p>

Resource	Description	Ordering, Downloading, and/or URL Information
<p>U.S. Department of Agriculture, Food and Nutrition Service, with the National Food Service Management Institute, <i>USDA Recipes for Child Nutrition Programs Alphabetical by Recipe Name</i></p>	<p>These updated recipes from the 1988 <i>Quantity Recipes for School Food Service</i> and the 1995 <i>Tool Kit for Healthy School Meals</i> have been edited and reflect the changes made in the newest edition of the <i>Food Buying Guide for Child Nutrition Programs</i>. At present, the recipes are available only on the National Food Service Management Institute (NFSMI) and the Team Nutrition and Healthy School Meals Resource System web sites. The recipes will be printed by USDA/FNS at a later date.</p>	<p>http://www.fns.usda.gov/tn/Resources/usda_recipes.html</p>

Reviewer's Guide to SMI Appendices

Appendix A: Nutrient Standards and Modifications Available

Appendix B: SMI Regulatory Requirements

Appendix C: SFA Responsibilities for SMI Compliance and Potential Fiscal Action

Appendix D: Menu Planning Practices for Healthy School Meals

Appendix E: Food Preparation Practices for Healthy School Meals

Appendix F: Meal Service Ideas for Healthy School Meals

Appendix G: Food Sources of Vitamin A

Appendix H: Food Sources of Vitamin C

Appendix I: Food Sources of Calcium

Appendix J: Food Sources of Iron

Appendix K: Food Sources of Dietary Fiber

Appendix L: Team Nutrition School Enrollment Form

Appendix M: Flowchart of SMI Review Process for State Agencies

Appendix N: Grains/Bread Requirements for Food-Based Menu Planning Approaches

Appendix A: Nutrient Standards and Modifications Available

Nutrient Standards: Food-Based Menu Planning

Traditional Meal Pattern: Lunch *Established Grade Groups*

- Preschool
- Grades K-3
- Grades 4-12
- **Optional** Grades 7-12

Minimum Nutrient and Calorie Levels for School Lunches Traditional Menu Planning Approach (School Week Averages)				
Nutrients and energy allowances	Pre-School	Grades K-3	Grades 4-12	Optional Grades 7-12
Energy Allowances (calories)	517	633	785	825
Total fat	1	1	1	1
Saturated fat	2	2	2	2
Protein (g)	7	9	15	16
Calcium (mg)	267	267	370	400
Iron (mg)	3.3	3.3	4.2	4.5
Vitamin A (RE)	150	200	285	300
Vitamin C (mg)	14	15	17	18

¹ Total fat not to exceed 30 percent of calories

² Saturated fat to be less than 10 percent of calories

Enhanced Meal Pattern: Lunch *Established Grade Groups*

- Preschool
- Grades K-6
- Grades 7-12
- **Optional** Grades K-3

Minimum Nutrient and Calorie Levels for School Lunches Enhanced Meal Pattern approach (School Week Averages)				
Nutrients and energy allowances	Pre-School	Grades K-6	Grades 7-12	Optional Grades K-3
Energy Allowances (calories)	517	664	825	633
Total fat	1	1	1	1
Saturated fat	2	2	2	2
Protein (g)	7	10	16	9
Calcium (mg)	267	286	400	267
Iron (mg)	3.3	3.5	4.5	3.3
Vitamin A (RE)	150	224	300	200
Vitamin C (mg)	14	15	18	15

¹ Total fat not to exceed 30 percent of calories

² Saturated fat to be less than 10 percent of calories

Appendix A (cont.)

Traditional and Enhanced Meal Patterns: Breakfast

Established Grade Groups

- Preschool
- Grades K-12
- **Optional** Grades 7-12 for Enhanced Food-Based Menu Planning.

Minimum Nutrient and Calorie Level for School Breakfast Enhanced and Traditional Food-Based Menu Planning Approach (School Week Averages)			
Nutrients and energy allowances	Pre-School	Grades K-12	Optional Grades 7-12 for Enhanced Meal Pattern
Energy Allowances (calories)	388	554	618
Total fat	1	1	1
Saturated fat	2	2	2
Protein (g)	5	10	12
Calcium (mg)	200	257	300
Iron (mg)	2.5	3.0	3.4
Vitamin A (RE)	113	197	225
Vitamin C (mg)	11	13	14

¹ Total fat not to exceed 30 percent of calories

² Saturated fat to be less than 10 percent of calories

Modifications Available to Traditional and Enhanced Food-Based Menu Planning

Modifications to the Meat/Meat Alternate—for Traditional and Enhanced Food-Based Menu Planning

This modification allows flexibility in planning the meat/meat alternate component for school lunches on a daily basis.

The required minimum quantities of the meat/meat alternate component may be offered as a weekly total. A minimum daily serving is a one-ounce serving (or its equivalent for certain meat alternates).

For example: The total weekly requirement of meat/meat alternate for the Traditional approach is 10 ounces for grades 4-12. The following chart illustrates how the daily portion sizes can vary.

<i>Monday</i>	<i>Tuesday</i>	<i>Wednesday</i>	<i>Thursday</i>	<i>Friday</i>	<i>Total</i>
2 oz	1 oz	3 oz	2 oz	2 oz	10 oz

Appendix A (cont.)

Modification for the Majority of the Children—for Traditional and Enhanced Food-Based Menu Planning

- **If only one age/ grade** is outside the established levels of the grade grouping, an SFA may use both the meal pattern portion sizes and the nutrient standards for the **majority of the children**.

Example: A school has grades K-4. Only one grade (4th) is outside the established grade group of Grades K-3. Since the majority of the children are in Grades K-3, the school may use the meal pattern portion sizes and nutrient standards for Grades K-3 to plan menus for students in Grades K-4.

Modification for Portion Sizes and Nutrient Levels—for Traditional Food-Based Menu Planning

Schools using the Traditional Food-Based Menu Planning approach may:

1. Use the portion sizes for the meal pattern for Grades 4-12 for children in Grades K-6, and follow the nutrient standards for children in Grades K-6.
2. Use the portion sizes for the meal pattern for Grades 4-12 for children in Grades 7-12, and follow the nutrient standards for children in Grades 7-12.

State agencies may or may not require prior approval for these modifications or may establish guidelines for using the modifications.

Appendix A (cont.)

Nutrient Standards: NSMP and ANSMP

NSMP and ANSMP:

Lunch

Established Grade Groups

- Preschool
- Grades K-6
- Grades 7-12
- **Optional** Grades K-3

Minimum Nutrient Standards and Calorie Levels for School Lunches NSMP/ANSMP Approaches (School Week Averages)				
Nutrients and energy allowances	Pre-School	Grades K-6	Grades 7-12	Optional Grades K-3
Energy Allowances (calories)	517	664	825	633
Total fat	¹	¹	¹	¹
Saturated fat	²	²	²	²
Protein (g)	7	10	16	9
Calcium (mg)	267	286	400	267
Iron (mg)	3.3	3.5	4.5	3.3
Vitamin A (RE)	150	224	300	200
Vitamin C (mg)	14	15	18	15

¹ Total fat not to exceed 30 percent of calories

² Saturated fat to be less than 10 percent of calories

NSMP and ANSMP:

Breakfast

Established Grade Groups

- Preschool
- Grades K-12
- **Optional** Grades 7-12

Nutrient Standards for Grade Groups NSMP/ANSMP Breakfast (School Week Averages)			
Nutrients and energy allowances	Pre-school	Grades K-12	Optional Grades 7-12
Energy Allowances (calories)	388	554	618
Total fat	¹	¹	¹
Saturated fat	²	²	²
Protein (g)	5	10	12
Calcium (mg)	200	257	300
Iron (mg)	2.5	3.0	3.4
Vitamin A (RE)	113	197	225
Vitamin C (mg)	11	13	14

¹ Total fat not to exceed 30 percent of calories

² Saturated fat to be less than 10 percent of calories

Appendix A (cont.)

NSMP and ANSMP:

Lunch

Established Age Groups (Optional)

For NSMP and ANSMP, schools have the *option* to provide the calorie and nutrient levels for school lunches and breakfasts for age groups as shown below:

- Ages 3-6
- Ages 7-10
- Ages 11-13
- Ages 14 and above

Minimum Nutrient and Calorie Levels for School Lunches NSMP Approaches (School Week Averages)				
Nutrients and energy allowances	Ages 3-6	Ages 7-10	Ages 11-13	Ages 14 and older
Energy Allowances/Calories	558	667	783	846
Total Fat	1	1	1	1
Saturated Fat	2	2	2	2
RDA for Protein (g)	7.3	9.3	15.0	16.7
RDA for calcium (mg)	267	267	400	400
RDA for Iron (mg)	3.3	3.3	4.5	4.5
RDA for Vitamin A (RE)	158	233	300	300
RDA for Vitamin C (mg)	14.6	15.0	16.7	19.2

¹ Total fat not to exceed 30 percent of calories

² Saturated fat to be less than 10 percent of calories

NSMP and ANSMP:

Breakfast

Established Age Groups (Optional)

- Ages 3-6
- Ages 7-10
- Ages 11-13
- Ages 14 and above

Minimum Nutrient and Calorie Levels for Optional Age Groups For School Breakfast (School Week Averages)				
Nutrients and energy allowances	Ages 3-6	Ages 7-10	Ages 11-13	Ages 14 and older
Energy Allowances/Calories	419	500	588	625
Total Fat	1	1	1	1
Saturated Fat	2	2	2	2
RDA for protein (g)	5.50	7.00	11.25	12.50
RDA for calcium (mg)	200	200	300	300
RDA for Iron (mg)	2.5	2.5	3.4	3.4
RDA for Vitamin A (RE)	119	175	225	225
RDA for Vitamin C (mg)	11.00	11.25	12.50	14.40

¹ Total fat not to exceed 30 percent of calories

² Saturated fat to be less than 10 percent of calories

Appendix A (cont.)

NSMP and ANSMP: Lunch and Breakfast

Customized Age Groups (Optional)

The option to customize age groups allows the menu planner to develop menus that are more accurately targeted to the nutritional needs of specific groups of children.

Remember, in NSMP/ANSMP, the menu planner must use at least two grade or age groups when planning lunches for students in Grades K-12.

Modifications of Nutrient Standards for the Majority of Children—for NSMP/ANSMP

Not all schools' grade structures will match the nutrient standard for the established grade or age groups.

- **If only one age/ grade** is outside the established levels, an SFA may use the nutrient standard levels for the majority of children.
- **When more than one grade or age** is outside of the established levels, the menu planner must use two grade or age groups.

Examples:

Grade groupings for Lunch:

- May use **one** grade group to plan meals for:
 - Grades K–4 → May use K–3
 - Grades 6–9 → May use 7–12
- At a minimum, use **two** grade groups to plan meals for:
 - Grades K–8 → Use K–6 and 7–12
 - Grades 5–8 → Use K–6 and 7–12

Appendix B: SMI Regulatory Requirements

The basic nutritional requirements for the school programs are found in Section 210.10 of the regulations for the NSLP and in Section 220.8 for the SBP. Compliance with the nutritional requirements is, of course, the basis for the service of reimbursable meals and also the basis for the SA's assessment. However, these sections also define areas that overlap with CRE reviews. This appendix provides an overview of what is considered the SMI regulations.

In addition to these regulations, FNS has developed prototype forms and guidance for the SA's use. FNS also provides policy oversight in the form of memoranda, questions and answers, and guidance materials such as this manual. The regulations, policy memoranda, and the guidance in this manual together constitute FNS' requirements, expectations, and assumptions for nutrition assessment reviews.

General SMI Requirements and Definitions §210.2, §210.10, §220.2, and §220.8

- **Meeting the nutrition standards:** For children, age two and older—under any menu planning approach—schools must offer, at a minimum, meals that contain calorie and nutrient levels appropriate to the age/grade group(s) served, plus applicable recommendations of the *Dietary Guidelines for Americans*. §210.10(a)(1)(i) and §220.8(a)
- **Timeframe:** The nutrition standards and calories and nutrients must be met over a school week. §210.10(a)(1)(i) and §220.8(a)
- **School week:** A minimum of three consecutive school days and a maximum of seven consecutive school days. Weeks with less than three days shall be combined with the previous or subsequent week. §210.2 and §220.2(w-1) For purposes of the SMI review, the compliance evaluation for the nutrition standards shall be conducted on the menu for any week of the current school year in which such evaluation is conducted. The week selected must continue to represent the current menu planning approach(es). §210.19(a)(1)(ii)
- **Lunch:** A meal that meets the age/grade appropriate nutrition standards and appropriate nutrient and calorie levels. For the food-based menu planning approaches, a lunch shall meet the food component/item and quantity requirements by age/grade groupings. For the nutrient-based menu planning approaches, the lunch must include at least three menu items, one of which must be an entrée and one of which must be fluid milk as a beverage. Schools must offer lunches between 10:00 am and 2:00 pm. §210.10(a)(1)(i), §210.10(g)(2)(i) and §210.10(f)(1)
- **Breakfast:** A meal that meets the nutrition standards, appropriate nutrient and calorie levels, and is served in the morning hours, at or close to the beginning the school day. §220.2(b)

Appendix B (cont.)

- **Records:** Schools must maintain the appropriate records for their menu planning system. For all schools, production and menu records are required to include sufficient information to evaluate the menus' contributions to meeting the nutrition standards. In addition, schools using NSMP or ANSMP must maintain their nutrient analysis records to demonstrate compliance with the nutrition standards. §210.10(a)(3) and §220.8(a)(6)
- **Combining the analysis:** Schools using NSMP/ANSMP may combine the nutrient analysis of lunches and breakfasts proportionately to the levels of participation in each program. §210.10(i)(5)(iii) [*Nutrient Analysis Protocols: How to Analyze Menus for USDA's School Meals Programs* contains guidance on combining breakfast and lunch.]
- **Recommended Dietary Allowances for lunch:** Lunches must provide one-third of the RDA for protein, calcium, iron, vitamin A, and vitamin C based on the appropriate age or grade group. §210.10(b)(1)
- **Recommended Dietary Allowances for breakfasts:** Breakfasts must provide one-fourth of the RDA for protein, calcium, iron, vitamin A, and vitamin C based on the appropriate age or grade group. §220.8(a)(1)
- **Lunchtime energy allowances:** Lunches must provide one-third of the Recommended Energy Intake based on the appropriate age or grade group. §210.10(b)(2)
- **Breakfast energy allowances:** Breakfasts must provide one-fourth of the Recommended Energy Intake based on the appropriate age or grade group. §220.8(a)(2)
- **Dietary Guidelines for Americans:** Provide the basis for Federal nutrition policy and nutrition education activities. These guidelines are revised every five years; the version to use will be specified in regulations. §210.10(b)(3), §210.10(b)(4), §220.8(a)(3), and §220.8(a)(4)
- **Dietary Guidelines for Americans:** The applicable recommendations are:
 - Eat a variety of foods;
 - Limit total fat to 30 percent of calories;
 - Limit saturated fat to less than 10 percent of calories;
 - Choose a diet low in cholesterol;
 - Choose a diet with plenty of grain products, vegetables, and fruits; and
 - Choose a diet moderate in salt and sodium. §210.10(b)(3) and §220.8(a)(3)*

** At the time of this publication, the regulations cite the 1995 guidelines. The guidelines listed here and elsewhere in this manual are the 1995 guidelines.*

Appendix B (cont.)

- ***Dietary Guidelines for Americans/Measures of Compliance***

The measurable recommendations are:

- A limit on the percent of calories from total fat to 30 percent based on the actual number of calories offered;
- A limit on the percent of calories from saturated fat to less than 10 percent based on the actual number of calories offered;
- A reduction of the levels of sodium and cholesterol.
- An increase in the levels of dietary fiber. §210.10(b)(4) and §220.8(a)(4)

Food-Based Menu Planning Requirements §210.10(k) and §220.8(g)

- ***Food component:*** One of the four food categories that comprise reimbursable meals planned under a food-based menu planning approach. The four food components are meat or meat alternate, milk, grains/breads and fruits/vegetables. §210.2
- ***Food item:*** One of the five required foods offered in lunches under a food-based menu planning approach: meat/meat alternate, milk, grains/breads and two different servings of fruits/vegetables; one of the four required foods offered in breakfasts under a food-based menu planning approach from three or four food components. §210.2 and §220.8(g)(1)
- ***Lunch age/grade groups for Traditional Food-Based:*** There are four age/grade groups established for the Traditional Food-Based Menu Planning approach: Preschool Ages 1-2, Preschool Ages 3-4, Grades K-3, Grades 4-12. These age/grade groupings are minimum requirements and are used both for the nutrition standards and for the meal pattern. There is also an optional age/grade group for Grades 7-12. §210.10 (k)(1)
- ***Lunch age/grade groups for Enhanced Food-Based:*** There are four age/grade groups established for the enhanced food-based menu planning approach: Ages 1-2, Preschool, Grades K-6, and Grades 7-12. These grade groupings are minimum requirements and are used both for the nutrition standards and for the meal pattern. There is also an optional grade group for Grades K-3. §210.10(k)(2)
- ***Breakfast age/grade groups for Traditional Food-Based:*** There are three established age/grade groups for the Traditional Food-Based Menu Planning approach for breakfast: Ages 1-2, Ages 3,4,5, and Grades K-12. These age/grade groupings are minimum requirements and are used both for the nutrition standards and for the meal pattern. §220.8(g)(2)
- ***Breakfast age/grade groups for Enhanced Food-Based:*** There are three age/grade groups established for the Enhanced Food-Based Menu Planning approach: Ages 1-2, Preschool and Grades K-12. These grade groupings are minimum requirements and are used both for the nutrition standards and for the meal pattern. There is also an optional grade group for Grades 7-12. §220.8(g)(3)

Appendix B (cont.)

- ***Meal Patterns:*** For both the Enhanced and Traditional Food-Based Menu Planning approaches, there are specific food components (meat/meat alternate, vegetables/fruits, grains/breads, and milk) and food items, and specific minimum quantities that must be offered. There are separate patterns for lunches and for breakfasts in each of the food-based menu planning approaches. §210.10(k), §220.8(g)
- ***Modifications available for food-based menu planning approaches:*** There are three modifications available to schools using one of the food-based menu planning approaches for lunches: 1) meat/meat alternate modification; 2) modification to age/grade groups (Traditional only) and 3) modification for the majority of children. State agencies may or may not require prior approval or may establish guidelines for using these modifications. §210.10(l)(2)
 - ***Modification to the meat/meat alternate component:*** For either of the food-based menu planning approaches, the required minimum quantities of the meat/meat alternate component may be offered as a weekly total with a one-ounce (or its equivalent for certain meat alternates) minimum daily serving size. §210.10(l)(2)(i)
 - ***Modification to age/grade groups under the Traditional Food-Based Menu Planning approach:*** For children in grades K-6, use the portion sizes in Group IV (grades 4-12) and follow the nutrient levels for children in grades K-6 for the Enhanced Food-Based Menu Planning approach. §210.10(l)(2)(ii)(A)

For children in grades 7-12, use the portion sizes in Group IV (grades 4-12) and follow the nutrient levels for children in grades 7-12 for the Enhanced Food-Based Menu Planning approach. §210.10(l)(2)(ii)(B)
 - ***Modification for the majority of children:*** For either of the food-based menu planning approaches, if only one age or grade is outside the established levels, schools may follow the levels for the majority of children for both quantities and the nutrition standards. §210.10(l)(2)(iii)
- ***Vegetable and fruit component for the Enhanced Food-Based Menu Planning Approach for lunches:*** For children in kindergarten through grade six, the requirement for this component is based on minimum daily servings *plus* an additional amount served during the week. §210.10(k)(4)(ii)
- ***Grains/breads component for Food-Based lunches:*** The grains/breads requirement is based on minimum daily servings and total servings per week. The requirement for this component is based on minimum daily servings *plus* total servings over a five-day period. The size servings for biscuits, rolls, muffins, and other grain/bread varieties are specified in the *Food Buying Guide* and FNS instructions. §210.10(k)(5)

Appendix B (cont.)

- ***Grain-based dessert for Enhanced Food-Based lunches:*** Under enhanced food-based menu planning, one serving per day of the grain/bread component may be a dessert. §210.10(k)(5)(iv)
- ***Offer versus serve (OVS) for Food-Based lunches:*** Under the food-based menu planning approaches, a school must offer all five required food items (meat/meat alternate, grains/breads, two servings of different vegetables and/or fruits, and fluid milk) for lunch. Senior high students shall be permitted to decline up to two of the five required food items. At the discretion of the school food authority, students below the senior high level may be permitted to decline one or two of the required five food items. §210.10(k)(6)
- ***Offer versus Serve (OVS) for Food-Based breakfasts:*** Under the food-based approaches for the breakfast program, OVS is optional and schools may allow students to refuse one food item from any component. §220.8(g)(4)

Nutrient Standard Requirements § 210.10(i) and (j), and §220.8(e) and (f)

- ***Nutrient Standard Menu Planning (NSMP)/Assisted Nutrient Standard Menu Planning (ANSMP):*** Schools may develop menus using USDA-approved computer software to analyze nutrient content for all menu items and foods offered over a school week. Menus are evaluated and modified as needed to ensure they meet specific calorie, calories from fat, and nutrient levels. The SFA/school conducts the analysis based on weighted (or simple) averages. For schools using ANSMP, another entity completes the menu planning and analysis. Planned menus must incorporate local food preferences and accommodate local food service operations. The software computes a weekly average for calories and for each of the following nutrients: protein; vitamin A; vitamin C; iron; calcium; total fat; saturated fat. The analysis also includes the dietary components of cholesterol, sodium, and dietary fiber. §210.2, §220.2(w-1), §210.10(i)(5), §210.10(j)(1), §220.8(e), and §220.8(f)(1)
- ***Menu item:*** Under NSMP or ANSMP, any single food or combination of foods. All menu items or foods offered as part of the reimbursable meal contribute toward meeting the nutrition standards, *except for* those foods that are considered as foods of minimal nutritional value (FMNV), unless the FMNV is offered as part of a menu item in a reimbursable meal. §210.2 and §220.2
- ***Entree:*** A combination of foods or a single food item that is offered as the main course. §210.2

Appendix B (cont.)

- ***Lunch age/grade groups for NSMP/ANSMP:*** The age/grade groups established for NSMP/ANSMP provide minimum levels of the required nutrients and calories. There are three grade groups established for NSMP/ANSMP for lunch: Preschool, Grades K-6, and Grades 7-12. These grade groupings are minimum requirements. There is also an optional grade group for Grades K-3. Schools may also offer meals to children using the following established age groups: Ages 3-6, Ages 7-10, Ages 11-13, and Ages 14 and above. Schools may also customize their own age groups and their corresponding nutrient and calorie levels. §210.10(c)
- ***Breakfast age/grade groups for NSMP/ANSMP:*** The minimum required grade groups established for NSMP/ANSMP for breakfast are Preschool and Grades K-12. There is also an optional grade group for Grades 7-12. Schools may also offer meals to children using the established age groups (Ages 3-6, Ages 7-10, Ages 11-13, and Ages 14 and above) or the school may customize age groups for the children they serve. §220.8(e)(ii)
- ***Modification for the majority of children available to NSMP/ANSMP approaches:*** If only one grade or age group is outside the established levels, schools may follow the levels for the majority of the children. §210.10(i)(1)(ii) and §220.8(e)(ii)
- ***Reimbursable lunch:*** A reimbursable lunch must be planned with enough menu items to meet nutrition goals, with a minimum of three menu items: entrée, side dish, and fluid milk. Under Offer versus Serve, a student shall select, at a *minimum*, an entree and one other menu item. If more than three menu items are offered, the student may decline up to two menu items; however, the entree cannot be declined. §210.10(i)(2)
- ***Reimbursable breakfast:*** A reimbursable breakfast must be planned with enough menu items to meet nutrition goals, with a minimum of three menu items, one of which must be fluid milk. §220.8(e)(2)
- ***Offer versus Serve (OVS) for NSMP/ANSMP lunches:*** Under OVS, a school must offer a minimum of three menu items. Senior high students must select at least two menu items and may decline a maximum of two menu items; one menu item selected must be an entree. If more than three menu items are offered, the student may decline up to two menu items; however, the entrée cannot be declined. At the discretion of the SFA, students below the senior high level may also participate in OVS. §210.2 and §210.10(i)(2)(ii)
- ***Offer versus Serve (OVS) for NSMP/ANSMP breakfasts:*** Under the optional OVS for the SBP, regardless of the number of menu items offered, a maximum of one menu item can be declined. §220.8(e)(2)(ii)
- ***Nutrient analysis:*** SFAs/schools using nutrient-standard menu planning must conduct the analysis on all menu items and foods offered in a reimbursable lunch. The analysis is conducted over a school week. Unless offered as part of a menu item in a reimbursable lunch, FMNV are not included in the analysis. §210.10(i)(3), §210.2, §220.8(e)(3), §220.2(m), and §220.2(w-1)

Appendix B (cont.)

- **Child Nutrition Database:** The Child Nutrition Database is a required part of all USDA approved software programs for conducting nutrient analysis. §210.10(i)(4)(i) and §220.8(e)(4)(i)
- **Software:** Any software used to conduct nutrient analysis must be evaluated by FNS or by FNS' designee beforehand and, as submitted, must have been determined to meet the minimum requirements established by FNS. The software must perform all functions required by FNS including calculation of weighted averages and the optional combining of analysis of the lunch and breakfast programs. §210.10(i)(4)(ii) and §220.8(e)(4)(ii)
- **Weighted average:** For nutrient analysis, menu or food items are weighted based on their proportionate contribution to the meals offered. This means that menu or food items more frequently selected are weighted more heavily than those not selected as frequently. §210.10(i)(5)(i) and §220.8(e)(5)(i). Public Law 108-265 (June 30, 2004) amended section 9 (f)(5) of the Richard B. Russell National School Lunch Act by extending the waiver of the requirement to conduct weighted averages through September 30, 2009.
- **Simple average:** Simple averaging is an alternate method for projecting the numbers of each menu or food items, in contrast to weighted averages, which gives more weight to nutrients that are more frequently selected by students. For nutrient analysis, simple averaging means giving equal weight to every menu/food item offered to students within each group of menu choices. In cases where students have the option of selecting more than one item from a group of choices, the menu planner must **choose a number** for the projected number of planned meals that is evenly divisible by the number of menu item selections available within all of the menu choice groupings.
- **Results of nutrient analysis:** The computed nutrient analysis average for the school week for each age/grade group, as compared with the appropriate nutrient and calorie levels. §210.10(i)(6) and §220.8(e)(6)
- **Adjustments to menus:** Once schools know the results of the nutrient analysis, they must adjust menus to meet the nutrition standards, prior to the service of the meals. Schools need to re-analyze menus when the students' selections change and, consequently, production levels change. Schools may need to change the menu items and foods offered given the students' selections and may need to modify the recipes and other specifications to make sure that the nutrition standards are met. §210.10(i)(7) and §220.8(e)(7)

Appendix B (cont.)

- **Standardized recipes:** Schools using NSMP must develop and follow standardized recipes. A standardized recipe is one that was tested to provide an established yield and quantity through the use of ingredients that remain constant in both measurement and preparation methods. USDA/FNS standardized recipes are included in the Child Nutrition Database. In addition, local standardized recipes used by school food authorities must be analyzed for their calories, nutrients, and dietary components and added to the local databases by school food authorities in accordance with guidance provided by FNS. §210.10(i)(8) and §220.10(e)(8)
- **Commercially-prepared or processed foods:** Any locally purchased processed foods that are not included in the Child Nutrition Database must be entered. The calories, nutrients and dietary components of purchased processed foods and menu items used in planned menus must be obtained by the SFA or SA and incorporated into the database at the local level in accordance with FNS guidance (*Nutrient Analysis Protocols*). §210.10(i)(9) and §220.8(e)(9)
- **Menu substitutions:** If the need for serving a substitute food(s) or menu item(s) occurs at least two weeks prior to serving the planned menu, the revised menu shall be reanalyzed based on the changes. If the need for serving a substitute food(s) or menu item(s) occurs two weeks or less prior to serving the planned menu, no re-analysis is required. However, to the extent possible, substitutions should be made using similar foods. §210.10(i)(10) and §220.8(e)(10)
- **Meeting the nutrition standards:** If the nutrient analysis conducted by the SFA/school shows that the menus offered are not meeting the nutrition standards and the appropriate levels of nutrients and calories, actions must be taken by the SFA or school to modify the menus, prior to meal service, to ensure that the meals offered to children comply with the nutrition standards and the appropriate levels of nutrients and calories. §210.10(i)(11) and §220.8(e)(11)
- **Other CN programs:** Any SFA that operates the Summer Food Service Program and/or the Child and Adult Care Food Program may, at its option and with State agency approval, prepare meals provided for those programs using the nutrient standard menu planning approach, except for children under two years of age. For school food authorities providing meals for adults, the SA may request FNS guidance. Supplements continue to be provided based on the appropriate program's meal pattern. §210.10(i)(12) and §220.8(e)(12)

Assisted Nutrient Standard Menu Planning §210.10(j) and §220.8(f)

Schools on ANSMP must meet the same provisions as the schools on NSMP as well as the following.

- **Assisted Nutrient Standard Menu Planning (ANSMP):** School food authorities without the resources to conduct NSMP may use an alternative that uses menu cycles

Appendix B (cont.)

- developed by other sources, such as the State agency, other SFAs, consultants, or food service management companies. §210.10(j)(1) and §220.8(f)(1)
- **Elements of ANSMP:** ANSMP establishes menu cycles that have been developed following the requirements for NSMP but that include local food preferences and accommodate local foodservice operations. These menu cycles incorporate all nutrition standards including the appropriate nutrient and calorie levels. In addition to the menu cycle, recipes, food product specifications, and preparation techniques shall also be developed and provided by the entity furnishing ANSMP to ensure that the menu items and foods offered conform to the nutrient analysis determinations of the menu cycle. §210.10(j)(2) and §220.8(f)(2)
- **State agency approval:** The State agency must approve the initial menu cycle, recipes, and other specifications to determine that all required elements for correct nutrient analysis are incorporated. The State agency shall also, upon request by the school food authority, provide assistance with implementation of the chosen system. §210.10(j)(3) and §220.8(f)(3)
- **Reassessment:** After the initial service of the menu cycle, the nutrient analysis shall be reassessed and appropriate adjustments made. §210.10(j)(4) and §220.8(f)(4)
- **Final responsibility:** Under ANSMP, the school food authority retains final responsibility for meeting the nutrition standards and the appropriate nutrient and calorie levels. §210.10(j)(5) and §220.8(f)(5)
- **Adjustments to menus:** If the analysis shows that the menus planned are not meeting the nutrition standards and the appropriate nutrient and calorie levels, then actions, including technical assistance and training, shall be taken by the State agency, school food authority, or school, as appropriate, to ensure that the lunches offered to children comply with the nutrition standards and the appropriate nutrient and calorie levels. §210.10(j)(6) and §220.8(f)(6)
- **Other CN programs:** Any school food authority that operates the Summer Food Service Program and/or the Child and Adult Care Food Program may, at its option and with State agency approval, prepare meals provided for those programs using the ANSMP approach, except for children under two years of age. For school food authorities providing meals for adults, the SA may request FNS guidance. Meal supplements shall continue to be provided based on the appropriate program's meal pattern. §210.10(j)(7) and §220.8(f)(7)

Alternate Menu Planning Approaches §210.10(l) and 220.8(h)

- **Definition:** SAs and SFAs may adopt or develop alternate menu planning approaches that differ from the established menu planning approaches (Traditional Food-Based, Enhanced Food-Based, NSMP, or ANSMP). §210.10(l)(1) and §220.8(h)(1)

Appendix B (cont.)

- ***Use and approval of major changes or new alternate approaches:*** Any SFA-developed menu planning approach must have prior SA review and approval. An SA-developed menu planning approach does not need FNS approval if: (1) five or more SFAs in the State use it; and (2) the SA maintains ongoing oversight of the operation and evaluation of the approach and makes any needed adjustments to its policies and procedures to ensure that the appropriate standards are met. However, an SA must notify FNS in writing when implementing the alternate approach. The alternate menu planning approach must be available in writing for review and monitoring purposes. No formal plan is required; guidance material, a handbook or protocol is sufficient. As appropriate, the material must address how the guidelines are met. §210.10 (l)(3) and §220.8 (h)(2)

Review Requirements §210.19(a) and (c) and §220.13(f)(3)

- ***Compliance with the nutrition standards:*** State agencies must evaluate compliance, over a school week of the current school year, with the nutrition standards for lunches and, as applicable, for breakfasts. §210.19(a)(1) and §220.13(f)(3)
- ***Type and number of reviews in an SFA:*** The type of review conducted by the State agency shall be determined by the menu planning approach chosen by the school food authority. At a minimum, the State agency shall review at least one school for each menu planning approach used in the school food authority. §210.19(a)(1)(i)(B)
- ***Review timeframes:*** At a minimum, the State agency must conduct an evaluation at least once during each five year review cycle provided that each SFA is evaluated at least once every six years. The reviews may be conducted at the same time a school food authority is scheduled for an administrative review (CRE). State agencies may also conduct these evaluations in conjunction with technical assistance visits, other reviews, or separately. §210.19(a)(1)(i)(A) and (a)(1)(ii)
- ***Evaluations of NSMP/ANSMP approaches:*** The State agency shall assess the nutrient analysis for any representative week to determine if the school food authority is correctly applying the NSMP or ANSMP methodology. Part of this assessment shall be a review of menus and production records to determine if they correspond to the analysis conducted by the school food authority and if the menu, as offered, over a school week, corresponds to the nutrition standards. §210.19(a)(1)(iii)
- ***Evaluations of Food-Based approaches:*** The State agency shall conduct a nutrient analysis on the menu(s) to determine if the nutrition standards are met. However, the State agency may use the nutrient analysis of a school or school food authority that offers meals using the food-based menu planning approach and conducts its own nutrient analysis under the regulatory criteria for nutrient standard menu planning and assisted nutrient standard menu planning approaches. §210.19(a)(1)(iv)

Appendix B (cont.)

- **Evaluations of Alternate Menu Planning approach:** For school food authorities following an alternate approach as provided under §210.10(l) or §220.8(h) that does not allow for use of the monitoring procedures outlined for Food-Based or NSMP, the State agency shall monitor compliance following the procedures developed in accordance with §210.10(l) or §220.8(h), whichever is appropriate. §210.19(a)(1)(vi). Any State agency alternate menu planning approach must explain how the alternate menu planning approach can be monitored under the applicable provisions of §210.18 and §220.19, including a description of the records that will be maintained to document compliance with the program's administrative and nutrition requirements.
- **Failure to comply:** If the menu for the school week fails to comply with the nutrition standards, a corrective action plan designed to rectify those deficiencies is developed by the SFA, with SA assistance and concurrence. The State agency shall monitor the SFA's progress to ensure that the terms of the corrective action plan are met. §210.19(a)(1)(v)
- **Noncompliance with the corrective action plan:** If a school food authority fails to meet the terms of the corrective action plan, the State agency shall determine if the school food authority is working in good faith towards compliance and, if so, may renegotiate the plan, if warranted. However, if the school food authority has not been acting in good faith to meet the terms of the plan and refuses to renegotiate the plan, the State agency shall determine if a disallowance of reimbursement funds is warranted. §210.19(a)(1)(vii)
- **Fiscal action:** If the SFA fails to take corrective action on compliance with the nutrition standards, the State agency shall take fiscal action for Claims for Reimbursement that are not properly payable. §210.19(c)

Miscellaneous Provisions

- **Lunch periods:** Schools are encouraged to provide an adequate number of lunch periods of sufficient length to ensure that all students have an opportunity to be served and have ample time to consume their meals. §210.10(f)
- **Nutrition information:** School food authorities are encouraged to make information available indicating efforts to meet the nutrition standards. §210.10(h) and §220.8(m)
- **Milk:** Schools must offer fluid milk—regardless of the menu planning approach. The selection of the types of milk offered shall be consistent with the types of milk consumed in the prior year. This requirement does not preclude schools from offering additional kinds of milk. However, in the event that a particular type of milk represents less than one (1) percent of the total amount of milk consumed in the previous year, a school may elect not to offer this type of milk. §210.10(m) and §220.8(i). *Note:* Public Law 108-265 (June 30, 2004) amended section 9(a) of the Richard B. Russell National School Lunch Act by deleting the prior year preference requirement. Effective July 1, 2005, schools will be required to offer “fluid milk in a variety of fat content

Appendix C:

SFA Responsibilities for SMI Compliance and Potential Fiscal Action for Noncompliance

When school food authorities (SFAs) agree to operate the Child Nutrition Programs (the National School Lunch Program and/or the School Breakfast Program), they are expected to commit sufficient attention, staff and resources to ensure that their Child Nutrition Programs are efficiently and effectively operated in compliance with all provisions of 7 CFR Part 210 and/or 220, and Part 245.

The School Meals Initiative (SMI), which is described in regulations (7 CFR Parts 210.10 and 220.8) and guidance, requires that school meals meet certain nutrition standards based on the *Dietary Guidelines for Americans*, the age/grade appropriate Recommended Dietary Allowances, and the appropriate energy allowances (calories). School food authorities are monitored for compliance with the nutrition standards at least every six years (7 CFR Parts 210.19(a)(1) and 220.13(f)(3)).

When the State agency (SA) monitors an SFA for compliance with SMI requirements, they will issue findings of non-compliance and the SFA will develop a Corrective Action Plan (CAP) with the assistance and concurrence of the State agency. If the SFA fails to complete their CAP in a timely manner, the SA must determine if the SFA is working in good faith to comply with the SMI requirements. If the SFAs is working in good faith, the CAP may be renegotiated with new activities and/or new timeframes. Repeated failures to complete the CAP in a timely manner indicate that the SFA is not working in good faith, because they are failing to commit the attention, staff and resources necessary to operate their programs in compliance with the requirements of SMI.

If a SA determines that an SFA is not working in good faith to rectify the deficiencies identified during the SMI review, the SA must determine if fiscal action is warranted. It is the SA's responsibility to ensure program integrity at the SFA level and recover any funds not properly payable according to regulations. Regulations provide for the disallowance or withholding of funds, if warranted, for failure to take corrective action to comply with the nutrition standards. Fiscal action would be appropriate to the extent (number) of the problem(s) and to their severity and longevity (duration).

Fiscal action can take the following forms:

- **Withholding** [7 CFR Part 210.24]: The State agency may withhold Program payments, in whole or in part, to any SFA which has failed to comply with regulations or with FNS guidelines and instructions. The SA will withhold Program payments until the SFA takes corrective action satisfactory to the SA. After the SA accepts the SFA's corrective action, payment will be released for funds properly payable to the SFA.
- **Disallowance** [7 CFR Part 210.19(c)]: SAs shall use their own procedures to disallow reimbursement for Claims for Reimbursement not properly payable according to regulations. SAs may also disallow funds for failure to take corrective action in accordance with regulations.

Ideas for Corrective Action Plans (CAP)

Appendix D: Menu Planning Practices for Healthy School Meals

Increase the variety of entrees offered.

- ✓ Plan more school-prepared items and/or look for new commercially-prepared products to increase variety.
- ✓ Choose more low-fat, low-sodium products.
- ✓ Use low-fat cheeses, dairy products, and lower fat meats.
- ✓ Explore the possibility of offering entrée salads or a salad bar.

Where choices are not offered, limit processed meats/meat alternates that have not been modified to reduce fat and/or sodium to once a week.

Plan more fruits and vegetables on your menus each day.

- ✓ Increase the amounts and variety of fruits and vegetables offered because fruits and vegetables differ in nutrient content.
- ✓ Offer a vitamin A-rich vegetable or fruit three to four times a week.
- ✓ Plan a vitamin C-rich vegetable or fruit three to four times a week, and include them frequently for breakfast.
- ✓ Offer cut-up fruit or dried fruit as a topping for yogurt.
- ✓ Offer fruit with more potassium often, such as bananas, prunes, prune juice, dried peaches, dried apricots, cantaloupe, honeydew melon, oranges, and orange juice.
- ✓ Offer fruit often as snacks if you provide reimbursable snacks for an after-school program.
- ✓ Frequently offer fresh vegetable salads or fresh vegetables with a low fat dip, such as low fat salad dressings, yogurt, or hummus.
- ✓ Offer fresh fruits frequently, such as orange smiles, apple wedges, bananas, grapes, fresh fruit cups, etc. Emphasize variety.

Plan at least one menu item containing a whole grain each day.

- ✓ Plan a variety of breads and bread alternates such as whole-wheat breads, multigrain breads, brown bread, and brown rice.
- ✓ Increase the variety of whole grain cooked and ready-to-eat cereals offered at breakfast.

Plan at least one serving of cooked dried beans or peas (legumes) each week.

- ✓ Offer more cooked dried beans and peas.
- ✓ Explore the great variety available such as black beans, Great Northern beans, red kidney beans, lima beans (mature), Navy beans, pinto beans, black-eyed peas, lentils, split peas, and garbanzo beans (also called chick peas), all of which can be offered in salad bars; as a vegetable such as Boston baked beans; made into soups; served as *frijoles* with Mexican food menu items; served as beans and rice in some parts of the country; and red kidney beans or pinto beans can even be ground and added to chili as part of the meat/meat alternate component. Beans can

Appendix D (Continued)

be ground and added to chili if children find whole beans unacceptable. Garbanzo or chickpeas can be made into hummus for a vegetable dipper.

Offer as many healthy alternate choices as your operation allows.

- ✓ In high schools, offer baked potatoes in addition to French fries.
- ✓ Offer low-fat sour cream, low-fat or nonfat yogurt for a topping in place of sour cream.
- ✓ Offer low-fat salad dressings in addition to regular salad dressing.

Where choices are not offered, offer no more than one high-fat menu item per meal.

Before placing new food products on your menus, obtain nutrition information about the item.

- ✓ Check for type(s) and quantity of fat and the amounts of sodium and/or sugar in the item.

Offer and promote unflavored skim milk or unflavored 1 percent low-fat milk at each meal.

- ✓ If flavored milk, such as chocolate or strawberry milk is offered, use only 1 percent low fat (or lower).

Appendix E: Food Preparation Practices for Healthy School Meals

To reduce fat

- ✓ Trim visible fat from raw meats before cooking.
- ✓ Cook meat on rack or drain fat from cooked meat (put in colander to drain or use a meat baster to remove fat).
- ✓ Chill meats, meat drippings, soups, stews, and sauces, when appropriate, so fats will solidify and can be easily removed.
- ✓ Limit deep-fat and pan frying; bake, broil or steam foods instead. When using precooked breaded meats, poultry, or fish, oven bake instead of frying them.
- ✓ When deep-fat fried foods are offered, select an unsaturated fat and carefully follow correct temperature, time, and draining procedures.
- ✓ Modify recipes by reducing the amount of butter, margarine, oil or shortening called for in the recipe, as appropriate. Reduce amounts of butter/margarine used for seasoning; do not use bacon grease, lard, or salt pork.
- ✓ Use non-stick cooking spray or parchment paper to reduce the amount of fat needed to prevent baked products from sticking.
- ✓ When serving fried fish or fried potatoes, offer low-fat condiments (e.g., lemon wedges, malt vinegar, catsup, sweet and sour sauce) instead of tartar sauce or other high-fat sauces.
- ✓ Use skim milk or nonfat dry milk in place of whole milk or cream in recipes when possible. Use plain yogurt instead of sour cream.
- ✓ In preparing items such as potato salad, carrot-raisin salad, chicken salad, etc., replace a portion of the mayonnaise-type salad dressing with plain, low-fat or nonfat yogurt.
- ✓ Reduce the amount of salad dressing you use on tossed or mixed salad.

To reduce salt or sodium

- ✓ Modify recipes by reducing the amount of salt, soy sauce, Worcestershire sauce, and other salty condiments as appropriate. Omit monosodium glutamate (MSG) from recipes.
- ✓ Do not add salt to canned vegetables.
- ✓ Only lightly salt fresh and frozen vegetables and entrees. Gradually reduce the amount of salt as low as the students will accept.
- ✓ Experiment with herbs, spices, and lemon for seasonings to use in place of salt.
- ✓ Reduce or eliminate the salt in the cooking water when cooking rice or pasta, if these foods will be served with a sauce or gravy or in a casserole.

To increase fiber

- ✓ Leave edible peels/skins on fruits and vegetables (e.g., use unpeeled apple in salads and fruit cups, leave potatoes unpeeled) for added fiber.
- ✓ Offer cooked dried peas or beans once a week.
- ✓ Offer a whole grain menu item each day
- ✓ Offer a fresh fruit or vegetable each day.

To retain nutrients

- ✓ Cook or steam vegetables in small batches until only tender-crisp. Do not hold longer than 20 minutes to retain nutrients, flavor, and color.

Appendix F: Meal Service Ideas For Healthy School Meals

- Work with your school superintendent, principal, PTA or PTO, and/or other appropriate groups to ensure that students have sufficient time to select and consume a healthful meal.
- Ensure that low-fat and skim milk are available throughout the entire lunch period.
- Check the temperature of milk to make sure it is cold and acceptable to students.
- Place skim and low-fat milks toward the front of the milk cabinet to facilitate their selection.
- Merchandise foods to encourage consumption of low-fat menu items.
- Steam vegetables only until tender-crisp.
- Offer meals that incorporate principles of good menu planning, including variety and a good balance of colors, shapes, textures, temperatures, and flavors.
- Plan attractive garnishes for steam table pans or individual pre-portioned foods.
- To ensure student appeal, conduct taste tests of new recipes and commercially-prepared food items.
- If a la carte food items are sold at all, make sure they are reflective of SMI, i.e., healthy choices.
- Promote healthful meal choices in menus and on the serving line.
- Model good eating habits and a positive attitude toward healthy foods.
- Promote good nutrition to teachers and school staff and enlist their support in modeling positive attitudes toward healthy eating.
- Provide nutrition education to students, parents, teachers, and/or food service staff, as appropriate.
- Include nutrition information on menus sent home to parents.

Appendix G: Food Sources of Vitamin A

Food sources of vitamin A ranked by International Units (IU). All foods are $\geq 20\%$ (1000 IU (of the Daily Value (DV) of 5000 IU for vitamin A. The DVs are used on the Nutrition Facts Label and are based on a 2000 diet.

Food Item	Serving Size	Vitamin A (IU)
Sweet potato, baked in skin	1 potato (146 grams)	28,058
Sweet potato, boiled, w/o skin	1 potato (156 grams)	24,554
Carrots, frozen, cooked, drained	$\frac{1}{2}$ cup	12,137
Sweet potato, canned, vacuum pack	$\frac{1}{2}$ cup	10,179
Pumpkin, canned	$\frac{1}{4}$ cup	9,532
Kale, cooked, drained	$\frac{1}{2}$ cup	8,854
Carrots, canned, drained	$\frac{1}{2}$ cup	8,154
Collards, boiled, drained	$\frac{1}{2}$ cup	7,709
Carrots, raw	$\frac{1}{2}$ cup	6,620
Dandelion greens, boiled, drained	$\frac{1}{2}$ cup	5,207
Vegetables, mixed, canned, drained	$\frac{1}{4}$ cup	4,746
Spinach, boiled, drained	$\frac{1}{4}$ cup	4,717
Mustard greens, boiled, drained	$\frac{1}{2}$ cup	4,426
Cabbage, Chinese (pak-choi), boiled, drained	$\frac{1}{2}$ cup	3,612
Turnip greens, boiled, drained	$\frac{1}{4}$ cup	2,745
Cantaloupe, raw	$\frac{1}{2}$ cup	2,706
Squash, winter, all varieties, baked	$\frac{1}{4}$ cup	2,677
Cantaloupe, raw	1/8 melon	2,334
Lettuce, green leaf, raw	$\frac{1}{2}$ cup	2,074
Apricots, canned juice pack, with skin, solids and liquids	$\frac{1}{2}$ cup	2,063
Soup, bean with ham, canned, chunky, ready-to-serve, commercial	$\frac{1}{2}$ cup	1,976
Vegetable juice cocktail, canned	4 fl. oz.	1,885
Peas, green, frozen, cooked, drained	$\frac{1}{2}$ cup	1,680
Lettuce, cos or romaine, raw	$\frac{1}{2}$ cup	1,626

Food Sources of Vitamin A (Continued):

Food Item	Serving Size	Vitamin A (IU)
Apricots, canned, heavy syrup pack, solids and liquids	½ cup	1,587
Broccoli, boiled, drained	½ cup	1,535
Grapefruit, raw, pink and red	½ grapefruit	1,415
Spinach, raw	½ cup	1,407
Plums, canned purple, juice pack, solids and liquids	½ cup	1,272
Apricots, dried, sulfured, uncooked	10 halves	1,261
Peppers, sweet, red, raw	¼ cup	1,167
Tangerines (mandarin oranges), canned, light syrup pack	½ cup	1,059

Source: Adapted from the Agricultural Research Service (ARS) Nutrient Database for Standard Reference, Release 17.

Appendix H: Food Sources of Vitamin C

All foods in this list contain 8 milligrams (mg) or more of vitamin C, which meets 20% of the nutrient target for school lunch (grades 4-12).

Food Item	Serving Size	Vitamin C (mg)
Asparagus, frozen, cooked, boiled	½ cup	22
Asparagus, frozen, cooked, boiled	4 spears	15
Banana	Medium	10
Broccoli, frozen, chopped, boiled	½ cup	37
Broccoli, raw	¼ cup	20
Brussels sprouts, frozen, cooked, boiled	¼ cup	18
Cabbage, Chinese (pak-choi), cooked, boiled	¼ cup	22
Cabbage, cooked, boiled	½ cup	15
Cabbage, red, raw	¼ cup	10
Carambola (starfruit), raw	¼ cup	9
Cauliflower, frozen, cooked, boiled	¼ cup	14
Cauliflower, raw	¼ cup	12
Coleslaw, school-prepared	¼ cup	10
Collards, frozen, chopped, boiled	½ cup	22
Corn, sweet, yellow, canned	½ cup	9
Cranberry juice cocktail, bottled	4 fl. oz.	45
Dandelion greens, cooked, boiled, drained	½ cup	10
Grapefruit sections, canned, light syrup pack, solids and liquid	¼ cup	14
Grapefruit, raw, white	¼ grapefruit	20
Grapes, red or green (such as Thompson seedless), raw	½ cup	9
Kale, cooked, boiled, drained	½ cup	27
Kiwi fruit (Chinese gooseberries), fresh	½ medium	35
Kohlrabi, cooked, boiled, drained	½ cup	45
Lemon juice, canned or bottled	2 tbsp.	8

Food Sources of Vitamin C (Continued):

Lima beans, immature seeds, frozen, cooked	½ cup	11
Mangos, raw	¼ cup	12
Melons, cantaloupe, raw	½ cup	29
Melons, honeydew, raw	1/8 melon	28
Melons, honeydew, raw	½ cup	15
Mustard greens, cooked, boiled	½ cup	18
Orange juice, canned, unsweetened	4 fl. oz.	43
Orange juice, chilled, includes from concentrate	4 fl. oz.	41
Oranges, raw, all commercial varieties	1 medium	70
Papayas, raw	¼ papaya	47
Peaches, frozen, sliced, sweetened	¼ cup	59
Peas, green, canned, regular pack	½ cup	8
Peas, green, frozen, cooked, boiled	¼ cup	8
Peppers, hot chili, green, raw	¼ pepper	27
Peppers, hot chili, red, raw	¼ pepper	16
Peppers, sweet, green, raw	¼ cup	30
Peppers, sweet, green, cooked, boiled, drained	¼ cup	25
Peppers, sweet, red, raw	¼ cup	71
Peppers, sweet, red, cooked, boiled, drained	¼ cup	58
Pimento, canned	1 tbsp.	10
Pineapple juice, canned, unsweetened	4 fl. oz.	13
Pineapple, canned, juice pack, solids and liquids	½ cup	12
Pineapple, raw, all varieties	¼ cup	14
Potato salad, school-prepared	½ cup	12
Potato wedges, frozen, commodity	½ cup	8
Potatoes, white, flesh and skin, baked	1 potato (7 oz)	19

Food Sources of Vitamin C (Continued):

Potatoes, hash-brown, school-prepared	½ cup	10
Potatoes, white, mashed, dehydrated, prepared from flakes without milk, whole milk and butter added	½ cup	11
Potatoes, white, mashed, school-prepared	½ cup	11
Raspberries, frozen, red, sweetened	½ cup	21
Refried beans, canned (includes commodity)	½ cup	8
Rutabagas, cooked, boiled	¼ cup	8
Sauerkraut, canned, solids and liquids	¼ cup	9
Soybeans, green, cooked, boiled	½ cup	15
Spinach, canned, drained solids	¼ cup	15
Squash, summer, all varieties, raw	½ cup	10
Squash, winter, all varieties, cooked, baked	½ cup	10
Strawberries, frozen, sweetened, sliced	½ cup	53
Strawberries, raw	½ cup	49
Sweet potato, canned, syrup pack, drained solids	½ cup	11
Sweet potato, cooked, baked in skin	1 potato	29
Tangerines (mandarin oranges), canned	¼ cup	12
Tangerines (mandarin oranges), raw	1 tangerine	22
Tomato juice, canned	4 fl. oz.	22
Tomato products, canned, puree	¼ cup	13
Tomato products, canned, sauce	½ cup	9
Tomatoes, cherry, red, ripe, raw	4 cherry tomatoes	9
Tomatoes, red, ripe, raw, chopped	½ cup	11

Food Sources of Vitamin C (Continued):

Tomato soup, canned, prepared with equal amount of water	½ cup	33
Turnip greens, frozen, cooked, boiled	½ cup	20
Turnip greens, frozen, cooked, boiled	½ cup	18
Vegetable juice cocktail, canned	4 fl. oz.	34
Watermelon, raw	1 wedge (10 oz)	23

Source: Adapted from the Agricultural Research Service (ARS) Nutrient Database for Standard Reference, Release 17.

Appendix I: Food Sources of Calcium

Good Food Sources of Calcium

All foods listed in this chart are $\geq 20\%$ (200 milligrams) of the Daily Value (DV) of 1000 milligrams (mg) for calcium. The DVs are used on the Food and Drug Administration's Nutrition Facts Label and are based on a 2000 calorie diet. A food that contains 200 mg or more of calcium contributes a substantial amount to the diet and is used here to define a good source.

Food Item	Serving Size	Calcium (Mg)
Yogurt, plain, skim milk	8-oz container	452
Yogurt, plain, low fat	8-oz container	415
Yogurt, fruit, low fat	8-oz container	345
Cheese, ricotta, part skim milk	$\frac{1}{2}$ cup	335
Milk, nonfat, fluid	1 cup	306
Milk, fluid, 2% milkfat	1 cup	285
Milk, whole, 3.25% milkfat	1 cup	276
Yogurt, plain, whole milk	8-oz container	275
Cheese, ricotta, whole milk	$\frac{1}{2}$ cup	255
Cheese, includes cheddar, mozzarella (part-skim), muenster and provolone	1 oz	204 - 214
Cereal, ready-to-eat, fortified	1 oz	236 - 1043

Other Food Sources of Calcium

All foods listed in this chart contain less than 200 milligrams of calcium. When these foods are used in combination with foods high in calcium and/or other foods in this list, they can assist schools in reaching the nutrition standard for calcium.

Food Item	Serving Size	Calcium (Mg)
Collards, frozen, chopped, cooked boiled, drained	$\frac{1}{2}$ cup	179
Cornbread, prepared from recipe, made with low fat (2%) milk	1 piece (2 oz)	162
Spinach, frozen, boiled, cooked, drained	$\frac{1}{2}$ cup	146
Soybeans, green, cooked, boiled, drained	$\frac{1}{2}$ cup	131
Seeds, sesame butter, tahini,	2 tbsp	128
Turnip greens, frozen, cooked, boiled, drained	$\frac{1}{2}$ cup	125
Fish, salmon, pink, canned, solids with bone and liquid	2 oz	119

Other Food Sources of Calcium (Continued):

Food Item	Serving Size	Calcium (Mg)
Cowpeas (Blackeyes), immature (not dried), cooked, boiled, drained	½ cup	106
Cereal, oats, instant, fortified, plain, prepared with water	1 packet	99
English muffins, plain, enriched, with calcium propionate	1 muffin	99
Beans, white, mature seeds, canned	½ cup	91
Kale, frozen, cooked, boiled, drained	½ cup	90
Okra, frozen, cooked, boiled, drained	½ cup	89
Soybeans, mature, cooked, boiled	½ cup	88
Ice cream, vanilla	½ cup	84
Cabbage, Chinese (pak-choi), cooked, boiled, drained	½ cup	79
Cheese, processed, American	1 oz	78
Waffles, plain, frozen, ready-to-eat	1 waffle (33 g)	77
Fish, ocean perch, Atlantic, cooked, dry heat	2 oz	76
Cereal, cream of wheat, regular, cooked with water	2/3 cup	75
Beans, baked, canned, with pork and tomato sauce	½ cup	71
Dandelion greens, cooked, boiled, drained	½ cup	71
Cheese, cottage, creamed	½ cup	70
Nuts, almonds	1 oz (24 nuts)	70

Source: Adapted from the Agricultural Research Service (ARS) Nutrient Database for Standard Reference, Release 17.

Appendix J: Food Sources of Iron

All foods in this list contain 0.8 mg or more of iron, which meets 20% of the nutrient target for school lunch (grades 4-12).

Food Item	Serving Size	Iron (Mg)
Soybeans, mature cooked, boiled	½ cup	4.4
Beans, baked, canned, with pork and tomato sauce	½ cup	4.0
Beans, white, mature seeds, canned	½ cup	4.0
Beef, liver, cooked	2 oz	3.5
Molasses, blackstrap	1 tbsp	3.5
Lentils, mature seeds, cooked, boiled	½ cup	3.3
Spinach, cooked, drained	½ cup	3.2
Beans, kidney, red, mature seeds, cooked	½ cup	2.6
Chickpeas (garbanzo beans), mature seeds, cooked	½ cup	2.4
Soybeans, green, cooked	½ cup	2.3
Beans, navy, mature seeds, cooked	½ cup	2.2
Lima beans, large, mature seed, dried, cooked	½ cup	2.2
Cake, gingerbread, from recipe	1 piece	2.1
Refried beans, canned (includes USDA commodity)	½ cup	2.0
Cereals ready-to-eat	1 cup	2 -22
Beans, great northern, mature seeds, cooked	½ cup	1.9
Potato, baked, flesh and skin	1 medium	1.9
Rolls, hard (includes Kaiser)	1 roll	1.9
Beans, black, mature seeds, cooked	½ cup	1.8
Beans, pinto, mature seeds, cooked boiled	½ cup	1.8
Beef, chuck, blade roast, braised	2 oz	1.8
Lima beans, immature seeds, frozen, baby or fordhook, cooked	½ cup	1.8
Biscuits, plain or buttermilk, prepared from recipe	2-1/2" biscuit	1.7
Cherries, sour, red, canned, water pack, solids and liquids (includes USDA commodity)	½ cup	1.7
Sauerkraut, canned, solids and liquids	½ cup	1.7
Bread, cornbread, from recipe, made with low-fat milk	1 piece	1.6
Bread, pita, white, enriched	6-1/2" pita	1.6
Peas, green, cooked	½ cup	1.6
Turnip greens, frozen, cooked, boiled	½ cup	1.6

Food Sources of Iron (Continued):

Food Item	Serving Size	Iron (Mg)
Beans, baked, canned, plain or vegetarian	½ cup	1.5
Beef, round bottom round, braised	2 oz	1.5
Beets, canned	½ cup	1.5
Beef, ground, 80% lean meat/ 20% fat, patty, broiled	2 oz	1.4
Pizza, cheese, regular crust, frozen	1 serving	1.4
Rolls, hamburger or hotdog, plain	1 roll	1.4
Asparagus, canned, drained solids	4 spears	1.3
Noodles, egg, cooked, enriched	½ cup	1.3
Peas, split, mature seeds, cooked	½ cup	1.3
Turkey, all classes, dark meat, roasted	2 oz	1.3
Cowpeas, common (black-eyed, crowder, southern), mature seeds, canned	½ cup	1.2
Collards, cooked	½ cup	1.1
Pizza, meat and vegetable, regular crust, frozen	1 serving	1.1
Pork, fresh, shoulder, arm picnic, braised	2 oz	1.1
Sweet potato, canned	½ cup	1.1
Tomato products, canned, puree	¼ cup	1.1
Tortillas, read-to-bake or fry, flour	1 tortilla	1.1
Fish fillet, battered or breaded, and fried	2 oz	1.0
Fish, tuna salad	½ cup	1.0
Muffins, corn, dry mix, prepared	1 muffin	1.0
Plums, canned, purple, heavy syrup pack, solids and liquids	½ cup	1.0
Rice, white, long-grain or regular, parboiled, enriched	½ cup	1.0
Tomato products, canned, paste	2 tbsp	1.0
Tomato sauce for pasta, spaghetti/marinara, ready-to serve	½ cup	1.0
Turkey, ground, cooked	2 oz	1.0
Bread, mixed-grain (includes whole-grain, 7-grain)	1 slice	0.9
Bread, pumpernickel	1 slice	0.9
Bread, rye	1 slice	0.9
Bread, white, commercially prepared (includes soft bread crumbs)	1 slice	0.9
Bread, whole-wheat, commercially prepared	1 slice	0.9
Brussels sprouts, cooked, boiled,	½ cup	0.9
Chicken, broilers or fryers, breast, roasted	½ breast	0.9
Crackers, matzo, plain	1 matzo	0.9
Fish, tuna, light canned in water, drained	2 oz	0.9
Macaroni, cooked, enriched	½ cup	0.9

Food Sources of Iron (Continued):

Food Item	Serving Size	Iron (Mg)
Muffins, blueberry, commercially prepared	1 muffin	0.9
Rolls, dinner, plain, commercially prepared	1 roll	0.9
Spaghetti, cooked, enriched	½ cup	0.9
Tomatoes, red, ripe, canned, stewed	¼ cup	0.9
Tomato soup, canned, prepared with equal volume water	½ cup	0.9
Turkey roast, boneless, light and dark meat, roasted	1 oz light and 1 oz dark	0.9
Vegetables, mixed canned	½ cup	0.9
Bread, wheat (includes wheat berry)	1 slice	0.8
Chicken, broilers or fryers, dark meat, meat only, roasted	2 oz	0.8
Fish, catfish, channel, cooked, breaded and fried	2 oz	0.8
Fish, haddock, cooked	2 oz	0.8
Frankfurter, chicken or beef	1 frank	0.8
Potato salad, school-prepared	½ cup	0.8
Raspberries, frozen, red, sweetened	½ cup	0.8
Strawberries, frozen, sweetened, sliced	½ cup	0.8
Sweet potato, cooked, baked	1 medium	0.8
Spaghetti, whole-wheat, cooked	½ cup	0.7

Source: Adapted from the Agricultural Research Service (ARS) Nutrient Database for Standard Reference, Release 17.

Appendix K: Food Source of Dietary Fiber

Good Food Sources of Dietary Fiber

All foods listed in the following chart are $\geq 10\%$ (2.5 grams) of the Daily Value (DV) of 25 grams. The DVs are used on the Nutrition Facts Label and are based on a 2000 calorie diet. A food with 2.5 grams of dietary fiber contributes a substantial amount of dietary fiber to the diet and is used here to define a good source.

Food Item	Serving Size	Dietary Fiber (grams)
Peas, split, mature seeds, cooked, boiled	½ cup	8.2
Refried beans, canned (includes USDA commodity)	½ cup	6.7
Soup, bean with ham, canned, chunky, ready-to-serve, commercial	½ cup	5.6
Raspberries, frozen, red, sweetened	½ cup	5.5
Papayas, raw	1 papaya	5.5
Sweet potato, cooked, baked in skin	1 potato (5 oz)	4.8
Artichokes, cooked, boiled, drained	½ cup	4.5
Potato, baked flesh and skin	1 potato (7 oz)	4.4
Pear, asian, raw	1 pear (small)	4.4
Bulgur, cooked	½ cup	4.1
Beans, kidney, red, mature seeds, canned	¼ cup	4.1
Raspberries, raw	½ cup	4.0
Cowpeas, blackeyes, crowder, southern, mature seeds, cooked, boiled	1/2 cup	4.0
Lentils, mature seeds, cooked, boiled	¼ cup	3.9
Beans, pinto, mature seeds, cooked, boiled	¼ cup	3.9
Blackberries, raw	½ cup	3.8
Beans, black, mature seeds, cooked, boiled	¼ cup	3.8
Figs, dried	2 figs	3.7
Pumpkin, canned	½ cup	3.6
Peas, green, canned, regular pack, drained	½ cup	3.5
Nuts, almonds	1 oz (24 nuts)	3.3
Dates, deglet noor	5 dates	3.3
Beans, kidney, red, mature seeds, cooked, boiled	¼ cup	3.3
Apple, raw, with skin	1 medium	3.3
Peaches, dried, sulfured, uncooked	3 halves	3.2

Good Food Sources of Dietary Fiber (Continued):

Food Item	Serving Size	Dietary Fiber (grams)
Brussels sprouts, frozen, cooked, boiled, drained	½ cup	3.2
Beans, white, mature seeds, canned	¼ cup	3.2
Banana, raw	1 medium	3.1
Beans, great northern, mature seeds, cooked, boiled.	¼ cup	3.1
Sauerkraut, cd,solids & liquids	½ cup	3.0
Prunes (dried plums), uncooked	5 prunes	3.0
Lima beans, lg mature seeds, canned	¼ cup	3.0
Sweet potato, canned, syrup packed, drained solids	½ cup	3.0
Seeds, sunflower seed kernels, dry roasted	¼ cup	2.9
Nuts, pistachio nuts, dry roasted	1 oz (47 nuts)	2.9
Apples, dried, sulfured, uncooked	5 rings	2.8
Peanuts, all types, oil-roasted	1 oz	2.7
Nuts, pecans	1 oz (20 halves)	2.7
Nuts, hazelnuts or filberts	1 oz	2.7
Collards,frozen,chopped, boiled	½ cup	2.7
Chickpeas (garbanzo beans), mature seeds, canned	¼ cup	2.7
Peanut butter, chunk style	2 tbsp	2.6
Okra, frozen, boiled, drained	½ cup	2.6
Nuts, mixed dry or oil roasted, with peanuts	1 oz	2.6
Cereal, oat, regular, quick, and instant, cooked with water	2/3 cup	2.6
Broccoli, boiled, drained	½ cup	2.6
Blueberries, frozen, sweetened	½ cup	2.6
Beans, baked, canned, plain or vegetarian	¼ cup	2.6
Apricots, dried, sulfured, uncooked	10 halves	2.6
Lima beans, immature seeds, frozen, fordhook, boiled	¼ cup	2.5
Crackers, rye, wafers, plain	1 wafer	2.5
Cauliflower, frozen, boiled, drained	½ cup	2.5
Carambola (starfish), raw	1 fruit	2.5
Carrots, boiled, drained	½ cup	2.4
Cereal, ready-to-eat, bran and/or whole grain	1 oz	2.2 – 8.0

Other Food Sources of Dietary Fiber - Contain Less than 2.5 Grams of Dietary Fiber

All foods listed in the following chart contain less than 2.5 grams of dietary fiber but can contribute substantial dietary fiber when used in combination with other such foods.

Food Item	Serving Size	Dietary Fiber (grams)
Pears, canned, drained	2 halves	2.4
Nectarines, raw	1 nectarine (136 g)	2.3
Nuts, macadamia nuts, dry roasted	1 oz (10-12 nuts)	2.3
Peanuts, all types, dry-roasted	1 oz (approx 28)	2.3
Sweet potato, canned, vacuum pack	½ cup	2.3
Bread, pumpernickel	1 slice (32 g)	2.1
Apricots, canned	½ cup	2.0
Bagels, cinnamon-raisin	1 bagel (4 “)	2.0
Beans, snap, green, frozen, cooked, boiled, drained	½ cup	2.0
Bread, rye	1 slice (32 g)	1.9
Bread, whole-wheat, commercial	1 slice (28 g)	1.9
Mushrooms, canned, drained solids	½ cup	1.9
Noodles, egg, spinach, cooked, enriched	½ cup	1.9
Blueberries, raw	½ cup	1.8
Plantains, cooked	½ cup	1.8
Rice, brown, cooked	1/2 cup	1.8
Bread, mixed-grain (includes whole-grain, 7-grain)	1 slice (26g)	1.7
Crackers, whole-wheat	4 crackers (16 g)	1.7
Strawberries, raw	½ cup	1.6
Tortillas, ready-to-cook, corn	1 tortilla (32 g)	1.6
Apple sauce, canned,	½ cup	1.5
Dandelion greens, cooked, boiled, drained	½ cup	1.5
English muffin, plain, enriched, with calcium propionate	1 muffin	1.5
Mangos, raw	½ cup	1.5
Tangerines (mandarin oranges), raw	1 tangerine (84 g)	1.5
Wild rice, cooked	½ cup	1.5

Source: Adapted from the Agricultural Research Service (ARS) Nutrient Database for Standard Reference, Release 17.

- Add beans to tacos, burritos, chili, and other Mexican dishes in addition to the meat already in the recipes.

Appendix L: Team Nutrition Enrollment Form

Team Nutrition School Enrollment Form



Our Team Nutrition School Leader is:

- ☐ Ms. ☐ Mrs.
☐ Mr. ☐ Other

FIRST NAME _____ LAST NAME _____

TITLE _____ SCHOOL'S NAME _____

TOTAL ENROLLMENT _____ GRADES TAUGHT _____

SCHOOL DISTRICT _____ SCHOOL COUNTY _____

SCHOOL ADDRESS _____

CITY _____ STATE _____ ZIP CODE _____

TELEPHONE () _____ FAX () _____

E-MAIL ADDRESS _____

Please check one or more of the appropriate grade ranges:

- ☐ P (PRESCHOOL) PRE-K ☐ E (ELEMENTARY) K-5/6 ☐ M (MIDDLE) 6/7-8 ☐ H (HIGH) 9-12

We agree to:

- Support USDA's Team Nutrition goal and values.
- Demonstrate a commitment to help students meet the Dietary Guidelines for Americans.
- Designate a Team Nutrition School Leader who will establish a school team.
- Distribute Team Nutrition materials to teachers, students and parents.
- Involve teachers, students, parents, food service personnel, and the community in interactive and entertaining nutrition education activities.
- Participate in the National School Lunch Program.
- Demonstrate a well-run Child Nutrition Program.
- Share successful strategies and programs with other schools.

We certify our school does not have any outstanding overclaims or significant program violations in our school meals programs.

SCHOOL PRINCIPAL, PRINTED NAME

SCHOOL FOOD SERVICE MANAGER, PRINTED NAME

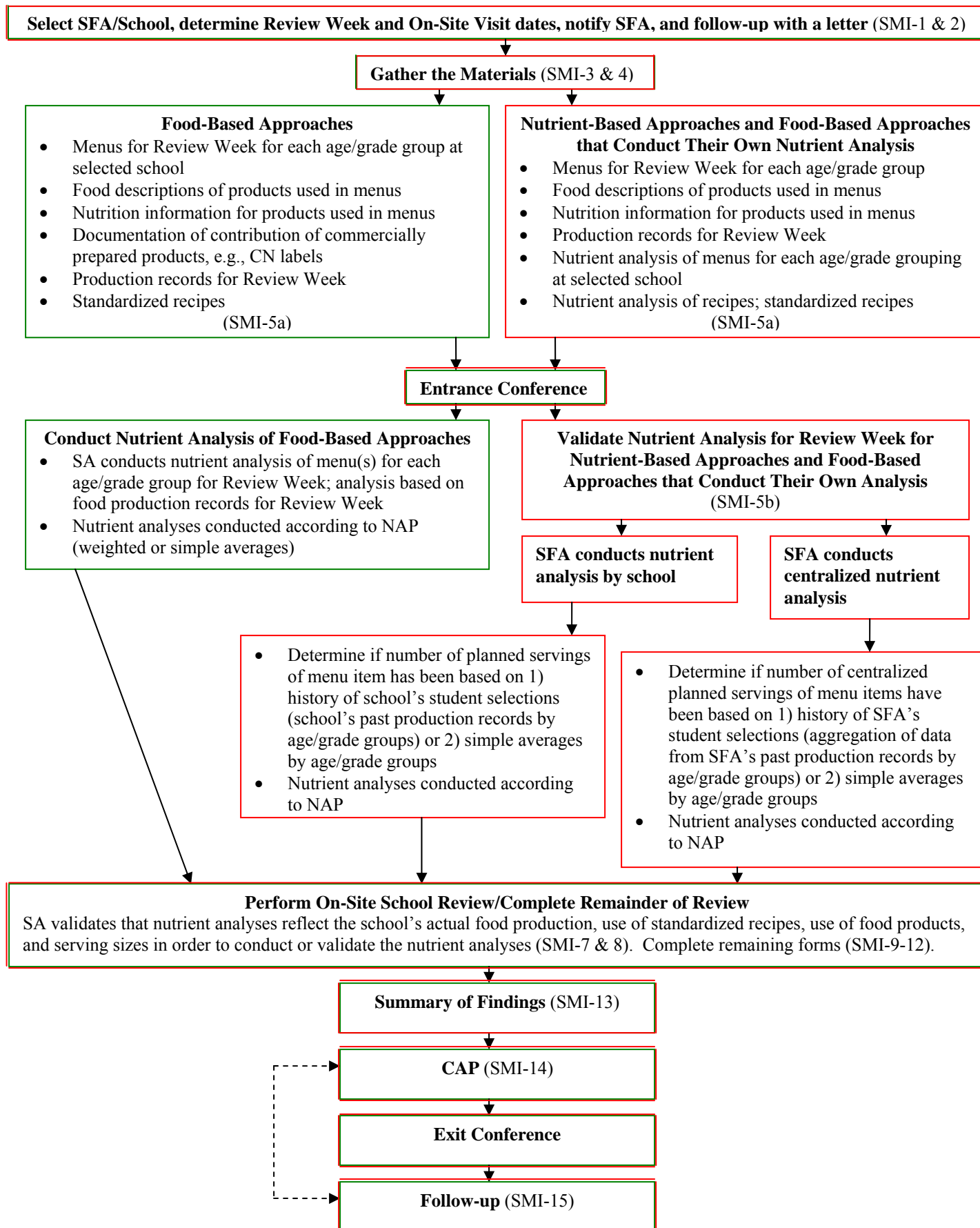
SIGNATURE

SIGNATURE

DATE

DATE

Appendix M: Flowchart of SMI Review Process for State Agencies



Appendix N (1): Grains/Bread Requirement for Food-Based Menu Planning Approaches

LUNCH GRAINS AND BREADS REQUIREMENTS TRADITIONAL FOOD-BASED MENU PLANNING APPROACH

*The requirement for the grain bread is based upon the minimum number of **daily** servings plus a required number of total servings over a **five-day school week**. Schools serving lunch six or seven days per week should increase the weekly quantity by approximately 20% for each additional day. Schools operating less than five days may decrease the weekly quantity by approximately 20% for each day less than five.*

Tip for RCCIs: Bread/Grain Calculations for other than a five-day week, the number of servings would be proportionally increased or decreased by rounding up to the nearest $\frac{1}{4}$ serving as indicated in the following chart.

Lunch Daily and Weekly Requirements for Grains/Breads

	<i>Ages 1 and 2</i>	<i>Ages 3 and 4</i>	<i>Grades K-3</i>	Grades 4-12	<i>Grades 7-12 (Optional)</i>
Number of school days in the week	Minimum of $\frac{1}{2}$ serving per day with total number of servings per week indicated by number of days of operation	Minimum of 1 serving per day with total number of servings per week as indicated by number of days of operation	Minimum of 1 serving per day with total number of servings per week as indicated by number of days of operation	Minimum of 1 serving per day with total number of servings per week as indicated by number of days of operation	Minimum of 1 serving per day with total number of servings per week as indicated by number of days of operation
Five days	5	8	8	8	10
Seven days	7	11 $\frac{1}{4}$	11 $\frac{1}{4}$	11 $\frac{1}{4}$	14
Six days	6	9 $\frac{3}{4}$	9 $\frac{3}{4}$	9 $\frac{3}{4}$	12
Four days	4	6 $\frac{1}{2}$	6 $\frac{1}{2}$	6 $\frac{1}{2}$	8
Three days	3	5	5	5	6
Two days	2	3 $\frac{1}{4}$	3 $\frac{1}{4}$	3 $\frac{1}{4}$	4
One day	1	1 $\frac{3}{4}$	1 $\frac{3}{4}$	1 $\frac{3}{4}$	2

Appendix N (2): Grains/Bread Requirement for Food-Based Menu Planning Approaches

LUNCH GRAINS AND BREADS REQUIREMENTS ENHANCED FOOD-BASED MENU PLANNING APPROACH

*The requirement for the grain bread is based upon the minimum number of **daily** servings plus a required number of total servings over a **five-day school week**. Schools serving lunch six or seven days per week should increase the weekly quantity by approximately 20% for each additional day. Schools operating less than five days may decrease the weekly quantity by approximately 20% for each day less than five.*

Tip for RCCI's: Bread/Grain Calculations for other than a five day week the number of servings would be proportionally increased or decreased by routing up to the nearest ¼ serving as indicated in the following chart.

Lunch Daily and Weekly Requirements for Grains/Breads

	<i>Ages 1 and 2</i>	<i>Preschool</i>	<i>Grades K-6</i>	<i>Grades 7-12</i>	<i>Grades K-3 (Optional)</i>
Number of school days in the week	Minimum of ½ serving per day with total number of servings per week indicated by number of days of operation	Minimum of 1 serving per day with total number of servings per week as indicated by number of days of operation	Minimum of 1 serving per day with total number of servings per week as indicated by number of days of operation	Minimum of 1 serving per day with total number of servings per week as indicated by number of days of operation	Minimum of 1 serving per day with total number of servings per week as indicated by number of days of operation
Five days	5	8	12	15	10
Seven days	7	11 ¼	17	21	14
Six days	6	9 ¾	14 ½	18	12
Four days	4	6 ½	9 ¾	12	8
Three days	3	5	7 ¼	9	6
Two days	2	3 ¼	5	6	4
One day	1	1 ¾	2 ½	3	2

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